

EXHIBIT A

Invoices

LORDSTOWN MOTORS CORP.
TASK CODE SUMMARY
AUGUST 1, 2023 - AUGUST 31, 2023

<u>Code</u>	<u>Category</u>	<u>Hours</u>	<u>Amount</u>
B110	Case Administration	6.5	3,334.50
B160	Fee - Employment Applications	44.3	33,729.00
B190	Other Contested Matters	5.2	3,877.50
B210	Business Operations	2.0	1,370.00
B400	Bankruptcy Related Advice	1.0	685.00
B460	Securities Matters	164.0	107,794.00
B470	Karma Automotice LLC v. Client, et al.	983.2	577,385.50
B490	Labor Matters	1.3	864.50
B510	General Benefit Matters	2.3	1,575.50
		1,209.8	730,615.50
	Less Discounts		-103,223.25
	Total	1,209.8	627,392.25

LORDSTOWN MOTORS CORP.
TIMEKEEPER SUMMARY
AUGUST 1, 2023 - AUGUST 31, 2023

<u>Timekeeper</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Atkinson, Susan L.	Paralegal	260.00	2.7	715.50
Barnes, Cory N.	Associate	450.00	38.5	17,325.00
Barrow Clark, Erica	Associate	970.00	0.6	582.00
Bingham, Frederick C.	Associate	805.00	0.3	241.50
Brennan, Terry M.	Partner	720.00	89.1	64,152.00
Brown, David H.	Associate	610.00	2.6	1,586.00
Calabretta, Mario	Litigation Coordinator	315.00	0.5	157.50
Dawson, Todd A.	Partner	665.00	1.3	864.50
Hanselman, Suzanne K.	Partner	805.00	0.2	161.00
Holbrook, Scott C.	Partner	690.00	153.6	105,984.00
Kavouras, Daniel M.	Partner	565.00	174.2	98,423.00
Lucchesi, Thomas R.	Partner	920.00	129.2	118,864.00
Martucci, Natalie E.	Paralegal	250.00	20.7	5,175.00
McDonald, Michael H.	Litigation Project Manager	310.00	85.7	26,567.00
Murray, Brian M.	Partner	685.00	2.3	1,575.50
Nash, Elliot J.	Associate	380.00	42.6	16,188.00
Ponikvar, Anthony B.	Associate	500.00	166.7	83,350.00
Prince, Scott E.	Associate	500.00	0.9	450.00
Shively, Douglas L.	Partner	555.00	2.2	1,221.00
Slater, James A.	Partner	685.00	3.0	2,055.00
Spreen, Janet A.	Partner	780.00	109.6	85,488.00
Stevenson, Brittany E.	Associate	400.00	51.8	20,720.00
Szalay, Sarah M.	Paralegal	260.00	2.3	598.00
VanNiel, Michael A.	Partner	790.00	46.8	36,972.00
Walsh, Joseph H.	Associate	500.00	82.4	41,200.00
			1,209.8	730,615.50
		Less Discounts		-103,223.25
		Total		627,392.25

**LORDSTOWN MOTORS CORP.
EXPENSE SUMMARY
AUGUST 1, 2023 - AUGUST 31, 2023**

Airfare/Trainfare	1,281.25
Corporate Services	296.10
Court Costs	228.00
Delivery Services	42.62
Miscellaneous	24.90
Outside Duplicating & Binding	21,102.41
Service of Process Fees/Subpoena Fee:	2,196.62
Total	25,171.90

Date	Name	Description	Rate	Hours	Amount
08/07/23	Atkinson, Susan L.	Finalize response and send PDF of approved executed letter to auditor and Ms. Leonard.	265.00	0.10	26.50
08/07/23	Hanselman, Suzanne K.	Conduct audit committee review of audit response.	805.00	0.20	161.00
08/07/23	Shively, Douglas L.	Review and address issues regarding editing and updating audit response.	555.00	1.20	666.00
08/10/23	Barrow Clark, Erica	Draft and revise litigation updates for Commitment and Contingencies.	970.00	0.60	582.00
08/23/23	VanNiel, Michael A.	Review and address general corporate and bankruptcy issues.	790.00	1.00	790.00
08/23/23	VanNiel, Michael A.	Correspondence with working group regarding general corporate and bankruptcy issues.	790.00	0.40	316.00
08/29/23	Szalay, Sarah M.	Access and obtain current docket and recently filed pleadings and forward to Mr. VanNiel for review.	260.00	0.20	52.00
08/30/23	Szalay, Sarah M.	Access and obtain filed pleadings and forward to Mr. VanNiel for review.	260.00	0.20	52.00
Case Administration(B110)				6.50	3,334.50
08/01/23	VanNiel, Michael A.	Review and analyze correspondence from creditors' committee regarding retention matters.	790.00	0.20	158.00
08/01/23	VanNiel, Michael A.	Correspondence with litigation teams regarding retention matters.	790.00	0.30	237.00
08/02/23	VanNiel, Michael A.	Review and address retention application issues regarding Baker retention as special counsel.	790.00	3.00	2,370.00
08/03/23	VanNiel, Michael A.	Prepare for meeting with multiple creditors' committee lawyers regarding special counsel retention application.	790.00	1.00	790.00
08/03/23	VanNiel, Michael A.	Attend meeting with multiple creditors' committee lawyers regarding special counsel retention application.	790.00	1.00	790.00

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Atlanta Los Angeles Chicago New York Cincinnati Orlando Cleveland Philadelphia Columbus San Francisco Costa Mesa Seattle Dallas Washington, DC Denver Houston Wilmington

Date	Name	Description	Rate	Hours	Amount
08/03/23	VanNiel, Michael A.	Follow-up with internal litigation team regarding retention matters discussed with creditors' committee.	790.00	0.50	395.00
08/04/23	VanNiel, Michael A.	Review and address special counsel retention inquiries from creditors' committee and other parties in interest.	790.00	1.50	1,185.00
08/07/23	VanNiel, Michael A.	Review and address multiple inquiries regarding retention application.	790.00	2.50	1,975.00
08/07/23	VanNiel, Michael A.	Prepare for telephone conference with working group regarding same and status of open litigated matters.	790.00	1.00	790.00
08/07/23	VanNiel, Michael A.	Attend telephone conference with working group regarding same and status of open litigated matters.	790.00	0.50	395.00
08/08/23	Prince, Scott E.	Analyze issues relating to Baker's retention application.	500.00	0.50	250.00
08/08/23	Prince, Scott E.	Prepare for call with United States Trustee regarding Baker's retention application.	500.00	0.40	200.00
08/08/23	VanNiel, Michael A.	Review and address additional special counsel retention issues and questions raised by parties in interest.	790.00	3.50	2,765.00
08/08/23	VanNiel, Michael A.	Multiple correspondence with debtor working group regarding open retention matters.	790.00	1.50	1,185.00
08/09/23	VanNiel, Michael A.	Review and revise draft responses to inquiries regarding retention application.	790.00	0.50	395.00
08/09/23	VanNiel, Michael A.	Correspondence with working group regarding comments to responses relating to retention issues.	790.00	1.00	790.00
08/10/23	VanNiel, Michael A.	Review and address additional retention issues as special counsel.	790.00	1.50	1,185.00
08/10/23	VanNiel, Michael A.	Telephone conference with Mr. Holbrook regarding recent developments in litigated matters.	790.00	0.50	395.00

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Date	Name	Description	Rate	Hours	Amount
08/11/23	VanNiel, Michael A.	Review and address retention issues relating to multiple litigation and corporate matters.	790.00	4.00	3,160.00
08/11/23	VanNiel, Michael A.	Correspondence with working group regarding litigation and corporate matters.	790.00	0.50	395.00
08/11/23	VanNiel, Michael A.	Prepare for conference call with client CEO and company representatives regarding same.	790.00	0.50	395.00
08/11/23	VanNiel, Michael A.	Attend conference call with client CEO and company representatives regarding same.	790.00	0.50	395.00
08/13/23	VanNiel, Michael A.	Review and address additional retention inquiries regarding special counsel.	790.00	1.00	790.00
08/13/23	VanNiel, Michael A.	Correspondence with working group regarding additional retention inquiries.	790.00	0.50	395.00
08/14/23	VanNiel, Michael A.	Review and address retention matters and inquiries.	790.00	0.50	395.00
08/14/23	VanNiel, Michael A.	Multiple correspondence and conference calls with debtor advisor team and internal working group regarding retention matters.	790.00	2.00	1,580.00
08/15/23	VanNiel, Michael A.	Review and address special counsel retention and Karma matters.	790.00	2.00	1,580.00
08/15/23	VanNiel, Michael A.	Multiple correspondence with working group regarding retention matters.	790.00	0.50	395.00
08/16/23	VanNiel, Michael A.	Review and follow-up regarding final open inquiries relating to special counsel retention and Karma matters.	790.00	1.50	1,185.00
08/16/23	VanNiel, Michael A.	Telephone conference and correspondence with working group regarding final retention application issues.	790.00	0.50	395.00
08/17/23	VanNiel, Michael A.	Review and finalize retention issues.	790.00	0.50	395.00
08/17/23	VanNiel, Michael A.	Correspondence with debtor working group regarding special counsel retention	790.00	0.50	395.00

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Date	Name	Description	Rate	Hours	Amount
		application.			
08/23/23	Szalay, Sarah M.	Prepare draft of Baker & Hostetler's First Monthly Fee Statement and forward to Mr. VanNiel for review and comment.	260.00	1.90	494.00
08/28/23	VanNiel, Michael A.	Review and analyze 80-20 procedures for monthly fee statements.	790.00	0.50	395.00
08/28/23	VanNiel, Michael A.	Correspondence with internal working group regarding 80-20 procedures for monthly fee statements.	790.00	0.30	237.00
08/28/23	VanNiel, Michael A.	Review and revise monthly statement support.	790.00	1.00	790.00
08/29/23	VanNiel, Michael A.	Review and address issues regarding first monthly fee statement support.	790.00	2.00	1,580.00
08/29/23	VanNiel, Michael A.	Multiple correspondence with internal working group regarding first monthly fee statement report.	790.00	0.70	553.00
08/30/23	VanNiel, Michael A.	Review and address issues regarding monthly fee statement form and supporting materials.	790.00	1.00	790.00
08/30/23	VanNiel, Michael A.	Multiple correspondence with litigation and corporate team leaders regarding monthly fee statement and supporting materials.	790.00	0.60	474.00
08/31/23	VanNiel, Michael A.	Multiple correspondence with internal team leaders regarding monthly fee statement issues.	790.00	0.40	316.00
Fee - Employment Application(B160)				44.30	33,729.00
08/02/23	Bingham, Frederick C.	Respond to client request for litigation report.	805.00	0.30	241.50
08/10/23	Shively, Douglas L.	Review and edit litigation disclosures.	555.00	1.00	555.00
08/22/23	VanNiel, Michael A.	Review and analyze select bankruptcy issues in coordination with lead bankruptcy counsel.	790.00	0.50	395.00

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Date	Name	Description	Rate	Hours	Amount
08/22/23	VanNiel, Michael A.	Prepare for working group meeting regarding select bankruptcy issues in coordination with lead bankruptcy counsel.	790.00	0.30	237.00
08/22/23	VanNiel, Michael A.	Attend working group meeting regarding select bankruptcy issues in coordination with lead bankruptcy counsel.	790.00	0.50	395.00
08/22/23	VanNiel, Michael A.	Correspondence with working group regarding open issues relating to select bankruptcy issues in coordination with lead bankruptcy counsel.	790.00	0.30	237.00
08/24/23	VanNiel, Michael A.	Correspondence with litigation and corporate working group regarding recent bankruptcy developments.	790.00	0.80	632.00
08/24/23	VanNiel, Michael A.	Review select bankruptcy filings in connection with litigation and corporate working group regarding recent bankruptcy developments.	790.00	1.00	790.00
08/29/23	VanNiel, Michael A.	Review and analyze recent pertinent bankruptcy filings regarding select matters BakerHostetler for which firm is special counsel.	790.00	0.50	395.00
Other Contested Matters(B190)				5.20	3,877.50
08/22/23	Slater, James A.	Review and analysis of records collected regarding battle of forms issue with supplier Teijen.	685.00	1.30	890.50
08/23/23	Slater, James A.	Draft analysis of battle of forms issues relating to Teijen matter.	685.00	0.70	479.50
Business Operations(B210)				2.00	1,370.00
08/18/23	Slater, James A.	Review demand and discussion with Ms. Leonard to discuss demand and battle of forms analysis.	685.00	1.00	685.00
Bankruptcy Related Advice(B400)				1.00	685.00

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Atlanta Los Angeles Chicago New York Cincinnati Orlando Cleveland Philadelphia Columbus San Francisco Costa Mesa Seattle Dallas Washington, DC Denver Houston Wilmington

B460 Securities Matters
 116592.000024

Name	Title	Hours	Rate	Amount
Spreen, Janet A.	Partner	109.60	\$ 780.00	\$ 85,488.00
Brown, David H.	Associate	2.60	610.00	1,586.00
Stevenson, Brittany E.	Associate	51.80	400.00	20,720.00
10% Courtesy Discount				(10,779.40)
Total		164.00		\$ 97,014.60

Date	Name	Description	Hours	Amount
08/01/23	Spreen, Janet A.	Calls with working group regarding 10-Q.	1.00	780.00
08/01/23	Spreen, Janet A.	Review and revise 10-Q.	2.50	1,950.00
08/01/23	Spreen, Janet A.	Review global notes disclosure.	0.50	390.00
08/01/23	Stevenson, Brittany E.	Review and summarize disclosure related to Foxconn.	1.70	680.00
08/02/23	Spreen, Janet A.	Call regarding review of disclosure of Foxconn relationship.	0.50	390.00
08/02/23	Spreen, Janet A.	Review and revise 10-Q.	1.30	1,014.00
08/02/23	Stevenson, Brittany E.	Review and summarize disclosure related to Foxconn.	1.30	520.00
08/03/23	Spreen, Janet A.	Review and revise 10-Q.	3.30	2,574.00
08/03/23	Spreen, Janet A.	Correspondence with working group regarding 10-Q matters.	1.00	780.00
08/03/23	Spreen, Janet A.	Attention to review of disclosure of Foxconn relationship.	1.00	780.00
08/03/23	Stevenson, Brittany E.	Review and summarize disclosure related to Foxconn.	3.00	1,200.00
08/04/23	Spreen, Janet A.	Review sample disclosure for 10-Q items	0.50	390.00

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Date	Name	Description	Hours	Amount
08/04/23	Spreen, Janet A.	Review and revise 10-Q.	3.70	2,886.00
08/04/23	Spreen, Janet A.	Correspondence with working group regarding 10-Q open items.	1.30	1,014.00
08/04/23	Spreen, Janet A.	Attention to review of disclosure of Foxconn relationship.	0.50	390.00
08/04/23	Stevenson, Brittany E.	Review and summarize disclosure related to Foxconn.	7.00	2,800.00
08/04/23	Stevenson, Brittany E.	Attend call with Ms. Spreen and Mr. Port to discuss the Form 10-Q.	0.50	200.00
08/05/23	Spreen, Janet A.	Provide Nasdaq correspondence to White & Case for document request.	0.70	546.00
08/05/23	Spreen, Janet A.	Attention to board minutes.	0.30	234.00
08/07/23	Spreen, Janet A.	Prepare audit committee minutes.	0.50	390.00
08/07/23	Spreen, Janet A.	Review and revise Form 10-Q.	5.00	3,900.00
08/07/23	Spreen, Janet A.	Attention to Audit Response letter.	0.50	390.00
08/07/23	Stevenson, Brittany E.	Review and summarize disclosure related to Foxconn.	1.10	440.00
08/08/23	Spreen, Janet A.	Review and revise Form 10-Q.	7.00	5,460.00
08/08/23	Spreen, Janet A.	Attend board meeting.	1.00	780.00
08/08/23	Stevenson, Brittany E.	Prepare Form 10-Q exhibits.	0.60	240.00
08/09/23	Spreen, Janet A.	Review and revise Form 10-Q.	5.60	4,368.00
08/09/23	Spreen, Janet A.	Prepare Audit Committee Meeting Minutes.	0.30	234.00
08/09/23	Stevenson, Brittany E.	Review and update Form 10-Q.	3.00	1,200.00
08/09/23	Stevenson, Brittany E.	Call with Mr. Port to discuss Form 10-Q.	0.50	200.00
08/10/23	Spreen, Janet A.	Review and revise Form 10-Q.	6.50	5,070.00
08/10/23	Stevenson, Brittany E.	Prepare and distribute Form 10-Q and exhibits for signature.	0.30	120.00

Baker & Hostetler LLP

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Dallas Denver Houston
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Date	Name	Description	Hours	Amount
08/10/23	Stevenson, Brittany E.	Review and update Form 10-Q.	8.50	3,400.00
08/10/23	Stevenson, Brittany E.	Review engagement letter and order to prepare related disclosure.	1.00	400.00
08/11/23	Spreen, Janet A.	Review and revise Form 10-Q.	6.50	5,070.00
08/11/23	Spreen, Janet A.	Circulate Audit Committee minutes for review.	0.20	156.00
08/11/23	Spreen, Janet A.	Attend Audit Committee meeting.	1.00	780.00
08/11/23	Stevenson, Brittany E.	Review and update Form 10-Q.	1.30	520.00
08/11/23	Stevenson, Brittany E.	Review and update Form 10-Q exhibits.	0.50	200.00
08/12/23	Spreen, Janet A.	Review and revise Form 10-Q in response to comments.	5.80	4,524.00
08/12/23	Stevenson, Brittany E.	Review and update Form 10-Q.	5.00	2,000.00
08/12/23	Stevenson, Brittany E.	Call with Ms. Spreen regarding Form 10-Q.	0.50	200.00
08/12/23	Stevenson, Brittany E.	Call with Mr. Port regarding Form 10-Q.	1.00	400.00
08/13/23	Spreen, Janet A.	Review and revise Form 10-Q in response to comments.	7.00	5,460.00
08/13/23	Spreen, Janet A.	Prepare Form 8-k to report Karma settlement.	2.00	1,560.00
08/13/23	Stevenson, Brittany E.	Review and update Form 10-Q.	3.10	1,240.00
08/13/23	Stevenson, Brittany E.	Call with Mr. Port to discuss Form 10-Q.	0.80	320.00
08/14/23	Spreen, Janet A.	Prepare and revise Form 8-k to report Karma settlement.	3.60	2,808.00
08/14/23	Spreen, Janet A.	Finalize Form 10-Q for filing.	3.80	2,964.00
08/14/23	Stevenson, Brittany E.	Review and update Form 8-K.	0.30	120.00
08/14/23	Stevenson, Brittany E.	Review and update Form 10-Q.	0.80	320.00
08/14/23	Stevenson, Brittany E.	Call with Mr. Port to discuss Form 10-Q.	0.50	200.00
08/15/23	Brown, David H.	Prepare draft audit committee minutes.	0.40	244.00

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Date	Name	Description	Hours	Amount
08/15/23	Spreen, Janet A.	Revise and coordinate filing of Form 8-k for Karma settlement.	4.20	3,276.00
08/15/23	Spreen, Janet A.	Attention to review of disclosures regarding Foxconn.	0.70	546.00
08/15/23	Spreen, Janet A.	Attention to preparation of board minutes.	0.20	156.00
08/15/23	Stevenson, Brittany E.	Review and update Form 8-K.	1.70	680.00
08/16/23	Brown, David H.	Prepare audit committee minutes.	0.70	427.00
08/16/23	Spreen, Janet A.	Review disclosure regarding Foxconn for securities claim class period.	3.50	2,730.00
08/17/23	Brown, David H.	Prepare August Board meeting minutes.	1.20	732.00
08/17/23	Spreen, Janet A.	Attention to Section 16 reporting question.	0.20	156.00
08/17/23	Spreen, Janet A.	Review disclosure regarding Foxconn for securities claim class period.	3.50	2,730.00
08/17/23	Stevenson, Brittany E.	Call with Ms. Spreen to discuss Foxconn disclosure research.	0.50	200.00
08/18/23	Brown, David H.	Prepare August Board meeting minutes.	0.20	122.00
08/18/23	Spreen, Janet A.	Review disclosure regarding Foxconn for securities claim class period.	3.00	2,340.00
08/18/23	Spreen, Janet A.	Attention to review of draft minutes for July meetings.	0.30	234.00
08/18/23	Stevenson, Brittany E.	Review and update Foxconn disclosure research.	5.00	2,000.00
08/21/23	Brown, David H.	Finalize Lordstown meeting minutes and send to Janet Spreen for final review.	0.10	61.00
08/21/23	Spreen, Janet A.	Attention to review of draft minutes.	0.50	390.00
08/21/23	Spreen, Janet A.	Review earnings call disclosure regarding Foxconn for securities claim class period.	1.00	780.00
08/22/23	Spreen, Janet A.	Attention to review of draft minutes.	0.50	390.00

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Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Dallas Denver Houston
 Los Angeles New York Orlando Philadelphia San Francisco Seattle Washington, DC Wilmington

Date	Name	Description	Hours	Amount
08/23/23	Spreen, Janet A.	Review bankruptcy plan and related disclosure statement.	1.50	1,170.00
08/24/23	Spreen, Janet A.	Prepare board minutes.	0.50	390.00
08/24/23	Spreen, Janet A.	Review bankruptcy plan and related disclosure statement.	4.00	3,120.00
08/25/23	Spreen, Janet A.	Prepare board minutes.	0.50	390.00
08/25/23	Spreen, Janet A.	Review bankruptcy plan and related disclosure statement.	4.00	3,120.00
08/28/23	Spreen, Janet A.	Attention to Form 8-k for hearing matters.	2.50	1,950.00
08/28/23	Stevenson, Brittany E.	Prepare Form 8-K.	2.00	800.00
08/29/23	Spreen, Janet A.	Attention to Form 8-k for hearing matters.	0.30	234.00
08/29/23	Spreen, Janet A.	Prepare for and attend Board meeting.	2.00	1,560.00
08/29/23	Stevenson, Brittany E.	Review and update Form 8-K.	0.30	120.00
08/30/23	Spreen, Janet A.	Attention to questions regarding shareholder list.	0.30	234.00
08/31/23	Spreen, Janet A.	Prepare and circulate board minutes.	2.00	1,560.00
Total			164.00	107,794.00

Baker & Hostetler LLP

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Dallas Denver Houston
 Los Angeles New York Orlando Philadelphia San Francisco Seattle Washington, DC Wilmington

B470

Karma Automotive LLC vs. Client, et al.

116592.000025

20428108

Name	Title	Hours	Rate	Amount
Brennan, Terry M.	Partner	89.10	\$ 720.00	\$ 64,152.00
Holbrook, Scott C.	Partner	153.60	690.00	105,984.00
Kavouras, Daniel M.	Partner	174.20	565.00	98,423.00
Lucchesi, Thomas R.	Partner	129.20	920.00	118,864.00
Barnes, Cory N.	Associate	38.50	450.00	17,325.00
Nash, Elliot J.	Associate	42.60	380.00	16,188.00
Ponikvar, Anthony B.	Associate	166.70	500.00	83,350.00
Walsh, Joseph H.	Associate	82.40	500.00	41,200.00
Martucci, Natalie E.	Paralegal	20.70	250.00	5,175.00
McDonald, Michael H.	Litigation Project Manager	85.70	310.00	26,567.00
Calabretta, Mario	Litigation Coordinator	0.50	315.00	157.50
Courtesy Discount				(33,513.00)
10% Courtesy Discount				(54,387.25)
Total		983.20		\$ 489,485.25

Date	Name	Description	Hours	Amount
08/01/23	Barnes, Cory N.	Analyze potential updated trial exhibits.	2.40	1,080.00
08/01/23	Brennan, Terry M.	Prepare for trial preparation meeting with Mr. Huang.	0.10	72.00
08/01/23	Brennan, Terry M.	Prepare for meeting with Mr. Lee.	0.20	144.00
08/01/23	Holbrook, Scott C.	Strategize regarding opening statement preparation.	1.50	1,035.00
08/01/23	Holbrook, Scott C.	Prepare Andrews trial outline.	1.00	690.00
08/01/23	Holbrook, Scott C.	Prepare Huan trial outline.	1.20	828.00
08/01/23	Holbrook, Scott C.	Attention to preparing retention application.	0.50	345.00

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Date	Name	Description	Hours	Amount
08/01/23	Holbrook, Scott C.	Strategize regarding settlement.	0.80	552.00
08/01/23	Holbrook, Scott C.	Prepare Durre trial outline.	2.50	1,725.00
08/01/23	Holbrook, Scott C.	Telephone call with Ms. Leonard and Mr. Lauria regarding case strategy.	0.50	345.00
08/01/23	Holbrook, Scott C.	Telephone calls with Mr. Zakia regarding case updates and settlement.	0.30	207.00
08/01/23	Holbrook, Scott C.	Telephone call with Ms. Leonard regarding case update.	0.10	69.00
08/01/23	Holbrook, Scott C.	Review protective order in connection with request of Karma to provide documents to creditors' committee.	0.30	207.00
08/01/23	Holbrook, Scott C.	Participate in settlement call with Karma's counsel.	0.50	345.00
08/01/23	Holbrook, Scott C.	Telephone call with White & Case regarding creditors' committee.	0.20	138.00
08/01/23	Kavouras, Daniel M.	Draft outline of potential deposition topics for preparation meeting with Mr. Kroll.	2.80	1,582.00
08/01/23	Kavouras, Daniel M.	Review DeFrank deposition in preparation for cross examination at trial.	2.30	1,299.50
08/01/23	Kavouras, Daniel M.	Review Kroll declarations in preparation for deposition preparation meetings.	2.00	1,130.00
08/01/23	Kavouras, Daniel M.	Correspondence with source code expert Dr. Miller regarding trial testimony.	0.40	226.00
08/01/23	Kavouras, Daniel M.	Correspondence with opposing counsel regarding pretrial filings and remaining depositions.	0.40	226.00
08/01/23	Kavouras, Daniel M.	Review published materials by Karma source code expert Robert Zeidman in preparation for cross-examination at trial.	2.00	1,130.00
08/01/23	Lucchesi, Thomas R.	Review draft order for access to courtroom in advance of trial.	0.20	184.00
08/01/23	Lucchesi, Thomas R.	Analyze settlement strategy.	1.00	920.00

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Date	Name	Description	Hours	Amount
08/01/23	Lucchesi, Thomas R.	Revise email to Seyfarth team regarding pretrial deadlines.	0.30	276.00
08/01/23	Lucchesi, Thomas R.	Review subpoenas for Karma and third-party witnesses.	0.50	460.00
08/01/23	Lucchesi, Thomas R.	Trial preparation, including development of trial themes for Post.	4.60	4,232.00
08/01/23	Lucchesi, Thomas R.	Strategize regarding Karma's recoverable damages.	1.50	1,380.00
08/01/23	Martucci, Natalie E.	Docket upcoming trial deadlines.	0.50	125.00
08/01/23	Martucci, Natalie E.	Create exhibits of all tables, figures, and schedules in James Pampinella expert report.	2.00	500.00
08/01/23	McDonald, Michael H.	Prepare consolidated plaintiff exhibits in Relativity database.	2.20	682.00
08/01/23	McDonald, Michael H.	Replace trial exhibits in Opus database with updated versions.	1.70	527.00
08/01/23	Nash, Elliot J.	Draft trial subpoenas for plaintiff's witnesses based on new trial date.	0.30	114.00
08/01/23	Ponikvar, Anthony B.	Analyze correspondence from opposing counsel regarding stipulation on the presentation of evidence.	0.40	200.00
08/01/23	Ponikvar, Anthony B.	Develop strategy regarding eliciting testimony from former employees.	0.50	250.00
08/01/23	Ponikvar, Anthony B.	Analyze learned treatises for potential use in cross examination of Karma's source code expert, Mr. Zeidman.	2.00	1,000.00
08/01/23	Ponikvar, Anthony B.	Compile written discovery responses to be used as potential exhibits in upcoming trial.	0.50	250.00
08/01/23	Ponikvar, Anthony B.	Analyze protective order for purposes of evaluating creditors' committee's request to see protected material.	0.30	150.00
08/01/23	Ponikvar, Anthony B.	Analyze source code cited by Karma's	1.00	500.00

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Date	Name	Description	Hours	Amount
		expert, Mr. Zeidman, to determine whether such code is publicly available.		
08/01/23	Ponikvar, Anthony B.	Draft trial subpoenas for Karma witnesses.	1.20	600.00
08/01/23	Ponikvar, Anthony B.	Revise outline for direct examination of forensics expert, Mr. Finch.	1.10	550.00
08/01/23	Ponikvar, Anthony B.	Revise supplemental exhibit list.	0.70	350.00
08/01/23	Ponikvar, Anthony B.	Revise correspondence to opposing counsel regarding pending trial deadlines.	0.20	100.00
08/01/23	Ponikvar, Anthony B.	Finalize trial outline for cross-examination of Karma's forensic expert, Mr. Kunkel.	1.00	500.00
08/01/23	Ponikvar, Anthony B.	Prepare exhibits to be used with damages expert, Mr. Pampinella.	0.50	250.00
08/02/23	Barnes, Cory N.	Analysis of outstanding trial subpoenas and witness locations.	0.50	225.00
08/02/23	Brennan, Terry M.	Prepare for witness interviews of Messrs. Lee, Huang, and LaFleur.	0.20	144.00
08/02/23	Brennan, Terry M.	Review court order regarding pretrial depositions.	0.10	72.00
08/02/23	Brennan, Terry M.	Review correspondence from Mr. Coleman regarding pretrial conference.	0.10	72.00
08/02/23	Holbrook, Scott C.	Prepare Andrews trial outline.	1.00	690.00
08/02/23	Holbrook, Scott C.	Strategize regarding trial exhibits.	0.80	552.00
08/02/23	Holbrook, Scott C.	Prepare Durre trial outline.	1.20	828.00
08/02/23	Holbrook, Scott C.	Strategize regarding opening statement outline.	1.90	1,311.00
08/02/23	Holbrook, Scott C.	Correspondence with White & Case regarding creditors' committee.	0.10	69.00
08/02/23	Holbrook, Scott C.	Correspondence with Ms. Leonard regarding trial witness Bernie Porter.	0.10	69.00
08/02/23	Holbrook, Scott C.	Analyze damages issues.	0.20	138.00

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Date	Name	Description	Hours	Amount
08/02/23	Holbrook, Scott C.	Telephone call with Mr. Zakia regarding settlement.	0.10	69.00
08/02/23	Holbrook, Scott C.	Correspondence with Ms. Leonard regarding damages issues.	0.20	138.00
08/02/23	Holbrook, Scott C.	Correspondence with Mr. Zakia regarding unjust enrichment damages.	0.20	138.00
08/02/23	Holbrook, Scott C.	Telephone call with Karma's counsel regarding settlement.	0.20	138.00
08/02/23	Holbrook, Scott C.	Telephone call with Ms. Leonard regarding damages issues.	0.10	69.00
08/02/23	Holbrook, Scott C.	Research recoverability of unjust enrichment damages.	1.30	897.00
08/02/23	Holbrook, Scott C.	Telephone call with Mr. Zakia regarding damages issues.	0.10	69.00
08/02/23	Kavouras, Daniel M.	Begin drafting cross examination of Jeff Defrank for trial.	3.10	1,751.50
08/02/23	Kavouras, Daniel M.	Research on availability of unjust enrichment damages.	2.20	1,243.00
08/02/23	Kavouras, Daniel M.	Review Karma reply brief in support of motion to strike in preparation for oral argument.	1.70	960.50
08/02/23	Kavouras, Daniel M.	Review Zeidman declaration and report in preparation for drafting cross-examination.	2.20	1,243.00
08/02/23	Lucchesi, Thomas R.	Telephone conference with Mr. Beach regarding litigation status and Karma claims asserted against company and individual defendants.	1.00	920.00
08/02/23	Lucchesi, Thomas R.	Work on Shen Zhang cross-examination.	1.10	1,012.00
08/02/23	Lucchesi, Thomas R.	Prepare for August 3 call with Creditors' Committee counsel.	0.40	368.00
08/02/23	Lucchesi, Thomas R.	Update audit letter response disclosure regarding litigation.	0.30	276.00

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Date	Name	Description	Hours	Amount
08/02/23	Lucchesi, Thomas R.	Work on McGavock cross-examination.	0.90	828.00
08/02/23	Lucchesi, Thomas R.	Review Karma's Reply Brief in support of motion to strike Pampinella opinions.	0.50	460.00
08/02/23	Lucchesi, Thomas R.	Follow up regarding settlement discussions and strategy.	0.40	368.00
08/02/23	Lucchesi, Thomas R.	Attend to case issues and action items.	3.50	3,220.00
08/02/23	Martucci, Natalie E.	Review docket in connection with trial preparation.	0.50	125.00
08/02/23	McDonald, Michael H.	Plan and prepare for court location printing services, addition of exhibit slip sheets to final set and timing for local printing of trial exhibits.	1.00	310.00
08/02/23	McDonald, Michael H.	Coordinate preparation of supplemental defendant trial exhibits.	0.30	93.00
08/02/23	Nash, Elliot J.	Analyze caselaw as to whether plaintiff can recover unjust enrichment damages in light of defendant's bankruptcy.	2.80	1,064.00
08/02/23	Ponikvar, Anthony B.	Participate in trial preparation session with forensic expert, Mr. Finch.	1.30	650.00
08/02/23	Ponikvar, Anthony B.	Compile relevant court orders and transcripts to have available at forthcoming trial.	0.80	400.00
08/02/23	Ponikvar, Anthony B.	Revise disclosure language regarding Karma litigation for purposes of public filings.	0.20	100.00
08/02/23	Ponikvar, Anthony B.	Develop trial strategy regarding eliciting testimony from Mr. Porter, and other potential former employees.	0.50	250.00
08/02/23	Ponikvar, Anthony B.	Revise potential demonstrative exhibits to be used at trial.	2.00	1,000.00
08/02/23	Ponikvar, Anthony B.	Plan and prepare for preparation session with forensic expert, Mr. Finch.	0.50	250.00

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Wilmington

Date	Name	Description	Hours	Amount
08/02/23	Ponikvar, Anthony B.	Prepare documents to be added to supplemental exhibit list.	0.50	250.00
08/02/23	Ponikvar, Anthony B.	Develop strategy for presentation of opening statement at upcoming trial.	1.50	750.00
08/03/23	Brennan, Terry M.	Correspond with Mr. Schmidt regarding trial preparation.	0.10	72.00
08/03/23	Brennan, Terry M.	Prepare examination and deposition preparation of Mr. Schmidt for trial.	4.40	3,168.00
08/03/23	Brennan, Terry M.	Review status of meet and confer on evidentiary issues.	0.40	288.00
08/03/23	Holbrook, Scott C.	Telephone call with creditors' committee regarding case issues.	1.30	897.00
08/03/23	Holbrook, Scott C.	Prepare Huan trial outline.	0.60	414.00
08/03/23	Holbrook, Scott C.	Correspondence with Ms. Leonard regarding case issues and trial preparation.	0.40	276.00
08/03/23	Holbrook, Scott C.	Correspondence with White & Case regarding case issues.	0.10	69.00
08/03/23	Holbrook, Scott C.	Analyze damages issues.	0.60	414.00
08/03/23	Holbrook, Scott C.	Correspondence with opposing counsel regarding pretrial deadlines.	0.30	207.00
08/03/23	Holbrook, Scott C.	Prepare Durre trial outline.	1.40	966.00
08/03/23	Holbrook, Scott C.	Prepare for call with the creditors' committee.	0.80	552.00
08/03/23	Holbrook, Scott C.	Work on opening statement.	0.70	483.00
08/03/23	Holbrook, Scott C.	Work on trial themes.	0.50	345.00
08/03/23	Holbrook, Scott C.	Work on affirmative case arguments.	0.30	207.00
08/03/23	Holbrook, Scott C.	Work on trial demonstratives.	0.80	552.00
08/03/23	Kavouras, Daniel M.	Prepare outline of arguments for pocket brief on California Business Code 16600 pursuant to court order.	2.00	1,130.00

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Date	Name	Description	Hours	Amount
08/03/23	Kavouras, Daniel M.	Analyze potential issues, arguments, and exhibits for opening statements.	3.60	2,034.00
08/03/23	Kavouras, Daniel M.	Review Zeidman deposition transcript in preparation for drafting cross-examination questions.	3.00	1,695.00
08/03/23	Lucchesi, Thomas R.	Participate in Zoom call with Creditors' Committee to discuss litigation.	1.30	1,196.00
08/03/23	Lucchesi, Thomas R.	Prepare for Zoom call with Creditors' Committee counsel.	0.80	736.00
08/03/23	Lucchesi, Thomas R.	Trial preparation, including Samoco cross-examination outline.	1.60	1,472.00
08/03/23	Lucchesi, Thomas R.	Preparation of opening statement and trial themes.	3.50	3,220.00
08/03/23	Martucci, Natalie E.	Compile all substantive orders and transcripts for trial preparation.	0.50	125.00
08/03/23	McDonald, Michael H.	Prepare metadata slip sheets for trial exhibits.	0.70	217.00
08/03/23	McDonald, Michael H.	Prepare and perform quality control on confidentiality redactions on consolidated plaintiff exhibits in Relativity database.	3.00	930.00
08/03/23	McDonald, Michael H.	Prepare consolidated plaintiff exhibits in Relativity database.	3.00	930.00
08/03/23	Nash, Elliot J.	Attend to status of trial subpoenas to update subpoena spreadsheet.	0.40	152.00
08/03/23	Ponikvar, Anthony B.	Analyze deposition testimony and declarations submitted by Mr. Durre and Mr. Huan to answer questions posed by creditors' committee regarding the same.	1.30	650.00
08/03/23	Ponikvar, Anthony B.	Work with litigation support team to prepare exhibits and other materials to be used at upcoming trial.	0.50	250.00
08/03/23	Ponikvar, Anthony B.	Monitor bankruptcy proceedings to determine potential impact on Karma	2.50	1,250.00

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Date	Name	Description	Hours	Amount
		litigation.		
08/03/23	Ponikvar, Anthony B.	Prepare demonstrative exhibits to be used at upcoming trial.	1.50	750.00
08/03/23	Ponikvar, Anthony B.	Develop arguments for opening statement.	3.00	1,500.00
08/03/23	Walsh, Joseph H.	Prepare fact witness trial preparation strategy.	0.50	250.00
08/04/23	Barnes, Cory N.	Correspondence with counsel for Karma regarding lodging of deposition testimony for use at trial.	0.30	135.00
08/04/23	Brennan, Terry M.	Review transcripts, complaint, and documents to prepare for examination of Mr. Schmidt.	4.80	3,456.00
08/04/23	Holbrook, Scott C.	Prepare Durre trial outline.	1.90	1,311.00
08/04/23	Holbrook, Scott C.	Strategize regarding arguments for opposing specific elements of Karma's claims.	1.20	828.00
08/04/23	Holbrook, Scott C.	Strategize regarding trial exhibits.	0.80	552.00
08/04/23	Holbrook, Scott C.	Strategize regarding trial demonstratives and preparation.	2.70	1,863.00
08/04/23	Kavouras, Daniel M.	Review Zeidman declaration in preparation for cross examination at trial.	1.10	621.50
08/04/23	Kavouras, Daniel M.	Continue drafting DeFrank cross examination outline.	2.00	1,130.00
08/04/23	Kavouras, Daniel M.	Prepare outline of topics for trial brief.	2.50	1,412.50
08/04/23	Kavouras, Daniel M.	Create potential demonstrative exhibits to accompany witness testimony and opening statements.	3.30	1,864.50
08/04/23	Lucchesi, Thomas R.	Develop demonstrative exhibits for use at trial.	2.50	2,300.00
08/04/23	Lucchesi, Thomas R.	Plan and prepare for August 11 meet and confer with Seyfarth team over jury instructions, discovery and pretrial	0.50	460.00

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Date	Name	Description	Hours	Amount
		deadlines.		
08/04/23	Lucchesi, Thomas R.	Work on McGavock cross-examination and arguments against Karma's damage theories.	1.20	1,104.00
08/04/23	Lucchesi, Thomas R.	Work on Shen Zhang cross-examination.	1.50	1,380.00
08/04/23	Lucchesi, Thomas R.	Revise outline for opening and trial themes.	1.30	1,196.00
08/04/23	McDonald, Michael H.	Plan and prepare for creation of hard copy versions of trial exhibits.	1.10	341.00
08/04/23	McDonald, Michael H.	Plan and prepare for court location printing services.	0.80	248.00
08/04/23	McDonald, Michael H.	Prepare consolidated plaintiff exhibits in Relativity database.	3.90	1,209.00
08/04/23	McDonald, Michael H.	Prepare and perform quality control on confidentiality redactions on consolidated plaintiff exhibits in Relativity database.	2.90	899.00
08/04/23	McDonald, Michael H.	Prepare modifications to plaintiff exhibits in Relativity database based on requests for withdrawal of exhibits and requests for addition of exhibits.	1.00	310.00
08/04/23	McDonald, Michael H.	Plan and prepare for creation of metadata slip sheets to attach to trial exhibits.	0.10	31.00
08/04/23	McDonald, Michael H.	Prepare status and timing expectations of trial exhibit creation.	0.40	124.00
08/04/23	Nash, Elliot J.	Attention to status of trial subpoenas to update subpoena spreadsheet.	0.10	38.00
08/04/23	Ponikvar, Anthony B.	Analyze correspondence from opposing counsel regarding designation of deposition testimony.	0.20	100.00
08/04/23	Ponikvar, Anthony B.	Analyze documents included on Karma's exhibit list to prepare for upcoming trial.	3.00	1,500.00
08/04/23	Ponikvar, Anthony B.	Develop logistical strategy for meeting all deadlines associated with upcoming trial.	1.00	500.00

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 Los Angeles New York Orlando Philadelphia San Francisco Seattle Washington, DC Wilmington

Date	Name	Description	Hours	Amount
08/04/23	Ponikvar, Anthony B.	Develop strategy for development of demonstrative exhibits to be used at upcoming trial.	2.50	1,250.00
08/04/23	Ponikvar, Anthony B.	Create demonstrative exhibits to use at upcoming trial.	1.00	500.00
08/04/23	Walsh, Joseph H.	Analyze documents related to witness John Cazort in anticipation of drafting exam outline.	1.00	500.00
08/04/23	Walsh, Joseph H.	Analyze Sung Bum Lee deposition transcript and exhibits in anticipation of drafting exam outline.	2.50	1,250.00
08/04/23	Walsh, Joseph H.	Analyze second deposition transcript and exhibits in anticipation of drafting exam outline.	2.50	1,250.00
08/05/23	Brennan, Terry M.	Revise Mr. Schmidt's trial outline.	0.50	360.00
08/05/23	Kavouras, Daniel M.	Review Jeff DeFrank deposition transcript of second deposition to prepare for cross examination at trial.	3.00	1,695.00
08/05/23	McDonald, Michael H.	Prepare modifications to plaintiff exhibits in Relativity database based on requests for withdrawal of exhibits and requests for addition of exhibits.	1.30	403.00
08/05/23	McDonald, Michael H.	Prepare supplemental defendant exhibits in Relativity database.	1.20	372.00
08/05/23	Nash, Elliot J.	Analyze caselaw as to whether and to what extent a party has or maintains property rights in trade secrets that are inextricably integrated into another product.	1.30	494.00
08/05/23	Ponikvar, Anthony B.	Analyze documents included on Karma's exhibit list to prepare for upcoming trial.	2.50	1,250.00
08/06/23	Brennan, Terry M.	Review transcript designations.	0.60	432.00
08/06/23	Kavouras, Daniel M.	Continue drafting DeFrank cross-examination outline for trial.	2.20	1,243.00
08/06/23	Kavouras, Daniel M.	Develop themes for opening statement and	1.10	621.50

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Date	Name	Description	Hours	Amount
		trial.		
08/06/23	McDonald, Michael H.	Prepare modifications to plaintiff exhibits in Relativity database based on requests for withdrawal of exhibits and requests for addition of exhibits.	1.00	310.00
08/06/23	McDonald, Michael H.	Prepare supplemental defendant exhibits in Relativity database.	4.30	1,333.00
08/06/23	Ponikvar, Anthony B.	Analyze documents included on Karma's exhibit list to prepare for upcoming trial.	3.00	1,500.00
08/06/23	Walsh, Joseph H.	Prepare strategy for meet and confer regarding jury instructions.	1.00	500.00
08/06/23	Walsh, Joseph H.	Analyze Karma's proposed instructions.	1.00	500.00
08/07/23	Barnes, Cory N.	Finalize deposition designations lodged with Court.	2.80	1,260.00
08/07/23	Brennan, Terry M.	Review objections to deposition counter-designations.	0.10	72.00
08/07/23	Brennan, Terry M.	Review deposition transcript of Mr. Schmidt.	0.70	504.00
08/07/23	Holbrook, Scott C.	Investigate options for destroying documents pursuant to pretrial settlement.	0.80	552.00
08/07/23	Holbrook, Scott C.	Correspondence with Ms. Leonard regarding settlement issues.	0.30	207.00
08/07/23	Holbrook, Scott C.	Prepare Durre trial outline.	3.20	2,208.00
08/07/23	Holbrook, Scott C.	Correspondence with Ms. Leonard regarding case update.	0.20	138.00
08/07/23	Holbrook, Scott C.	Strategize regarding defense of Pampinella deposition.	0.10	69.00
08/07/23	Holbrook, Scott C.	Prepare Elley trial outline.	1.20	828.00
08/07/23	Holbrook, Scott C.	Prepare Andrews trial outline.	1.30	897.00
08/07/23	Kavouras, Daniel M.	Draft email to opposing counsel summarizing position on evidentiary	1.50	847.50

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Date	Name	Description	Hours	Amount
		stipulation.		
08/07/23	Kavouras, Daniel M.	Prepare outline of topics for call with source code expert Jeffrey Miller.	2.00	1,130.00
08/07/23	Kavouras, Daniel M.	Call with source code expert Jeffrey Miller to discuss trial preparation.	0.60	339.00
08/07/23	Kavouras, Daniel M.	Review proposed data for metadata slip sheets proposed by Karma.	2.20	1,243.00
08/07/23	Lucchesi, Thomas R.	Work on damages cross-examination outline (McGavock).	2.00	1,840.00
08/07/23	Lucchesi, Thomas R.	Respond to questions from White & Case regarding settlement issues.	0.40	368.00
08/07/23	Lucchesi, Thomas R.	Analyze issues for pretrial briefing.	0.40	368.00
08/07/23	Lucchesi, Thomas R.	Review jury instructions, including objections to Karma's proposed instructions to prepare for August 11 meet and confer call.	1.00	920.00
08/07/23	Lucchesi, Thomas R.	Consider potential demonstrative exhibits.	0.40	368.00
08/07/23	Lucchesi, Thomas R.	Work on Post direct examination.	1.20	1,104.00
08/07/23	Lucchesi, Thomas R.	Review Nranian report to develop cross-examination outline.	1.20	1,104.00
08/07/23	Martucci, Natalie E.	Update cast of characters demonstrative.	0.20	50.00
08/07/23	McDonald, Michael H.	Prepare defendant exhibits in Relativity database.	4.00	1,240.00
08/07/23	Nash, Elliot J.	Analyze caselaw regarding trade secret issues.	1.80	684.00
08/07/23	Ponikvar, Anthony B.	Communicate with Mr. Porter regarding upcoming trial.	0.20	100.00
08/07/23	Ponikvar, Anthony B.	Prepare materials sent by Mr. Pampinella for use as potential exhibits at trial.	1.00	500.00
08/07/23	Ponikvar, Anthony B.	Develop strategy for direct testimony of Mr. Durre at trial.	1.00	500.00

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Date	Name	Description	Hours	Amount
08/07/23	Ponikvar, Anthony B.	Finalize strategy regarding opposing counsel's proposal regarding metadata slipsheets.	0.70	350.00
08/07/23	Ponikvar, Anthony B.	Draft demonstrative exhibits to use during opening and closing statements at upcoming trial.	2.50	1,250.00
08/07/23	Ponikvar, Anthony B.	Draft demonstrative exhibits to use with expert witnesses, Mr. Finch and Mr. Pampinella.	1.00	500.00
08/07/23	Ponikvar, Anthony B.	Draft and revise supplemental exhibit list.	0.50	250.00
08/07/23	Walsh, Joseph H.	Prepare examination outlines for Christine Secord, Sung Bum Lee, and John Cazort.	0.80	400.00
08/07/23	Walsh, Joseph H.	Analyze Karma's proposed jury instructions.	3.50	1,750.00
08/07/23	Walsh, Joseph H.	Prepare strategy for meet and confer regarding jury instructions.	1.00	500.00
08/08/23	Barnes, Cory N.	Communication with counsel for Karma regarding designated trial deposition testimony.	0.30	135.00
08/08/23	Brennan, Terry M.	Review deposition transcripts referencing Mr. Schmidt.	2.00	1,440.00
08/08/23	Brennan, Terry M.	Review documents related to Mr. Schmidt, including emails and filings.	1.80	1,296.00
08/08/23	Brennan, Terry M.	Review transcript of Mr. Schmidt's deposition to prepare trial outline.	2.20	1,584.00
08/08/23	Brennan, Terry M.	Prepare Mr. Schmidt for trial testimony.	1.90	1,368.00
08/08/23	Holbrook, Scott C.	Strategize regarding potential settlement of Karma litigation.	1.50	1,035.00
08/08/23	Holbrook, Scott C.	Prepare Durre trial outline.	4.50	3,105.00
08/08/23	Holbrook, Scott C.	Telephone call with White & Case regarding potential settlement.	0.50	345.00
08/08/23	Holbrook, Scott C.	Draft language for proposed settlement	0.50	345.00

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Date	Name	Description	Hours	Amount
		agreement.		
08/08/23	Holbrook, Scott C.	Prepare Andrews trial outline.	1.20	828.00
08/08/23	Kavouras, Daniel M.	Analyze proposed evidentiary stipulation and accompanying documents and metadata spreadsheet.	3.00	1,695.00
08/08/23	Kavouras, Daniel M.	Review potential exhibits for trial testimony of Stephen Punak.	2.00	1,130.00
08/08/23	Kavouras, Daniel M.	Create potential demonstrative exhibits for source code expert testimony.	2.80	1,582.00
08/08/23	Kavouras, Daniel M.	Review objections to jury instructions in preparation for meet and confer.	1.00	565.00
08/08/23	Lucchesi, Thomas R.	Continued development of strategies for refuting Karma's damage claims at trial.	1.00	920.00
08/08/23	Lucchesi, Thomas R.	Draft email to individual defendants regarding case status and developments.	0.30	276.00
08/08/23	Lucchesi, Thomas R.	Strategize regarding settlement issues.	0.50	460.00
08/08/23	Lucchesi, Thomas R.	Review and consider examination topics for witnesses Secord, Cazort and Sung Bum Lee to be examined by Mr. Walsh.	0.60	552.00
08/08/23	Lucchesi, Thomas R.	Zoom call with White & Case attorneys to discuss intellectual property issues and agreement to destroy certain records as part of settlement obligations.	0.50	460.00
08/08/23	Lucchesi, Thomas R.	Continued revision and reworking of opening statement and trial themes per input from litigation team.	5.20	4,784.00
08/08/23	Martucci, Natalie E.	Create demonstrative for categories of trade secrets.	2.00	500.00
08/08/23	Martucci, Natalie E.	Create demonstrative for endurance/silverado comparison.	2.00	500.00
08/08/23	McDonald, Michael H.	Finalize defendant exhibits in Relativity database.	2.70	837.00

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Date	Name	Description	Hours	Amount
08/08/23	McDonald, Michael H.	Plan and prepare for court location printing services.	0.20	62.00
08/08/23	McDonald, Michael H.	Prepare modifications to plaintiff exhibits in Relativity database based on requests for withdrawal of exhibits and requests for addition of exhibits.	0.50	155.00
08/08/23	McDonald, Michael H.	Plan and prepare for creation of metadata slip sheets to attach to trial exhibits.	0.90	279.00
08/08/23	McDonald, Michael H.	Prepare defendant exhibits format for hard copy conversion in Relativity database.	1.90	589.00
08/08/23	McDonald, Michael H.	Perform quality control on exported defendant trial exhibits for use in hard copy conversion.	1.60	496.00
08/08/23	McDonald, Michael H.	Prepare plaintiff exhibits in Relativity database.	1.20	372.00
08/08/23	McDonald, Michael H.	Prepare and perform quality control on confidentiality redactions on consolidated plaintiff exhibits in Relativity database.	0.80	248.00
08/08/23	Nash, Elliot J.	Coordinate service of trial subpoenas.	0.10	38.00
08/08/23	Nash, Elliot J.	Analyze caselaw regarding trade secret issues.	1.70	646.00
08/08/23	Nash, Elliot J.	Draft objections to Karma's proposed jury instructions.	0.40	152.00
08/08/23	Ponikvar, Anthony B.	Participate in call with White & Case regarding draft settlement agreement.	0.50	250.00
08/08/23	Ponikvar, Anthony B.	Work with litigation support team to prepare hard copy and electronic versions of all exhibits at upcoming trial.	2.00	1,000.00
08/08/23	Ponikvar, Anthony B.	Coordinate service of trial subpoenas on Karma witnesses.	0.40	200.00
08/08/23	Ponikvar, Anthony B.	Revise portions of proposed settlement agreement related to return or destruction of information.	1.00	500.00

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Date	Name	Description	Hours	Amount
08/08/23	Ponikvar, Anthony B.	Develop strategy for presentation of source code files to jury at trial.	0.50	250.00
08/08/23	Ponikvar, Anthony B.	Revise cross-examination outline of Karma's forensics expert, Mr. Vaughn.	2.00	1,000.00
08/08/23	Ponikvar, Anthony B.	Create demonstrative exhibit related to Karma's allegations related to misappropriation of e/e architecture block diagram.	1.00	500.00
08/08/23	Ponikvar, Anthony B.	Draft supplemental exhibit list.	1.00	500.00
08/08/23	Walsh, Joseph H.	Analyze Ninth Circuit law on jury instruction objections.	1.00	500.00
08/08/23	Walsh, Joseph H.	Prepare strategy for drafting jury instruction objections.	1.00	500.00
08/08/23	Walsh, Joseph H.	Communicate with Mr. Lee regarding trial preparation.	0.20	100.00
08/08/23	Walsh, Joseph H.	Communicate with Ms. Wurmlinger regarding trial preparation.	0.20	100.00
08/08/23	Walsh, Joseph H.	Prepare examination outlines for Christine Secord, Sung Bum Lee, and John Cazort.	0.50	250.00
08/09/23	Brennan, Terry M.	Review correspondence on Secord and related issues in preparation for drafting trial outline.	0.40	288.00
08/09/23	Brennan, Terry M.	Review trade secret listing and statement of case.	1.20	864.00
08/09/23	Calabretta, Mario	Analyze trial exhibit workflow.	0.50	157.50
08/09/23	Holbrook, Scott C.	Analyze options for dismissal order in connection with potential settlement.	0.90	621.00
08/09/23	Holbrook, Scott C.	Revise drafts of 9019 motion to approve potential settlement.	1.30	897.00
08/09/23	Holbrook, Scott C.	Revise drafts of settlement agreement with Karma.	1.70	1,173.00
08/09/23	Holbrook, Scott C.	Correspondence with White & Case	0.40	276.00

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Date	Name	Description	Hours	Amount
		regarding settlement issues.		
08/09/23	Holbrook, Scott C.	Correspondence with Ms. Leonard regarding case issues.	0.20	138.00
08/09/23	Holbrook, Scott C.	Strategize regarding jury instructions.	1.50	1,035.00
08/09/23	Holbrook, Scott C.	Telephone call with Mr. Turetsky regarding creditors' committee.	0.20	138.00
08/09/23	Holbrook, Scott C.	Telephone call with White & Case regarding settlement strategy.	0.20	138.00
08/09/23	Holbrook, Scott C.	Prepare Elley trial outline.	1.50	1,035.00
08/09/23	Holbrook, Scott C.	Prepare Andrews trial outline.	0.90	621.00
08/09/23	Holbrook, Scott C.	Prepare Durre trial outline.	0.80	552.00
08/09/23	Kavouras, Daniel M.	Analyze issues for meet and confer with opposing counsel on jury instructions.	1.60	904.00
08/09/23	Kavouras, Daniel M.	Review outlines of trial testimony topics for Christine Secord, John Cazort, and Sung Bum Lee.	1.90	1,073.50
08/09/23	Kavouras, Daniel M.	Prepare topics for direct examination of Adam Kroll at trial.	2.50	1,412.50
08/09/23	Kavouras, Daniel M.	Review potential sources of cross-examination for Karma experts, including public source code.	1.00	565.00
08/09/23	Lucchesi, Thomas R.	Revise Christine Secord cross-examination outline.	0.30	276.00
08/09/23	Lucchesi, Thomas R.	Prepare for August 11 meet and confer with Seyfarth over jury instructions and case deadlines.	1.00	920.00
08/09/23	Lucchesi, Thomas R.	Work on outline for Zak Stelmasek direct examination and exhibits.	2.20	2,024.00
08/09/23	Lucchesi, Thomas R.	Respond to inquiries from White & Case relating to settlement mechanics and strategy.	1.50	1,380.00

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Date	Name	Description	Hours	Amount
08/09/23	Lucchesi, Thomas R.	Review drafts of Settlement Agreement and Motion for Approval of Settlement of the Karma litigation.	1.20	1,104.00
08/09/23	Lucchesi, Thomas R.	Respond to Mr. Stelmaszek regarding trial scheduling.	0.20	184.00
08/09/23	Lucchesi, Thomas R.	Revise draft email to opposing counsel proposing deadlines and setting up issues to streamline agenda for August 11 meet and confer.	0.20	184.00
08/09/23	Martucci, Natalie E.	Update demonstrative for Endurance/Silverado comparison.	1.00	250.00
08/09/23	Martucci, Natalie E.	Create demonstrative for home network layout.	4.50	1,125.00
08/09/23	McDonald, Michael H.	Prepare metadata slip sheets for trial exhibits.	0.90	279.00
08/09/23	McDonald, Michael H.	Prepare plaintiff exhibit naming convention for branding on hard copy in Relativity database.	1.30	403.00
08/09/23	McDonald, Michael H.	Prepare and perform quality control on confidentiality redactions on consolidated plaintiff exhibits in Relativity database.	0.20	62.00
08/09/23	McDonald, Michael H.	Prepare plaintiff exhibits format for hard copy conversion in Relativity database.	3.00	930.00
08/09/23	McDonald, Michael H.	Perform quality control on exported defendant trial exhibits for use in hard copy conversion.	0.10	31.00
08/09/23	McDonald, Michael H.	Document exhibit creation process in Relativity database to assist in streamlining exhibit creation.	1.30	403.00
08/09/23	McDonald, Michael H.	Prepare plaintiff exhibits in Relativity database.	0.70	217.00
08/09/23	McDonald, Michael H.	Plan and prepare plaintiff and defendant exhibit creation.	0.60	186.00
08/09/23	McDonald, Michael H.	Prepare exhibit sort order in final trial	0.40	124.00

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Date	Name	Description	Hours	Amount
		exhibit database.		
08/09/23	McDonald, Michael H.	Plan and prepare for plaintiff and defendant exhibit hard copy conversion with Profile Discovery.	1.30	403.00
08/09/23	Nash, Elliot J.	Attention to service of trial subpoena on trial witness, Mr. Enrique Hernandez.	0.10	38.00
08/09/23	Nash, Elliot J.	Draft objections to Karma's proposed jury instructions.	1.30	494.00
08/09/23	Nash, Elliot J.	Conduct public records search to identify address for trial witness, Mr. Enrique Hernandez.	0.20	76.00
08/09/23	Nash, Elliot J.	Analyze California and federal caselaw regarding trade secret issues.	2.40	912.00
08/09/23	Ponikvar, Anthony B.	Communicate with Mr. Stelmaszek regarding upcoming trial.	0.20	100.00
08/09/23	Ponikvar, Anthony B.	Prepare electronic and hard copy versions of all trial exhibits for potential use at upcoming trial.	2.00	1,000.00
08/09/23	Ponikvar, Anthony B.	Develop demonstrative exhibits to be used at upcoming trial.	1.50	750.00
08/09/23	Ponikvar, Anthony B.	Revise draft settlement agreements.	1.20	600.00
08/09/23	Ponikvar, Anthony B.	Research federal law regarding ability to file conditional dismissal.	1.00	500.00
08/09/23	Walsh, Joseph H.	Draft email to opposing counsel regarding jury instructions.	0.50	250.00
08/09/23	Walsh, Joseph H.	Prepare objections to Karma's pretrial jury instructions.	5.50	2,750.00
08/09/23	Walsh, Joseph H.	Prepare for meet and confer with opposition counsel on jury instructions.	1.00	500.00
08/09/23	Walsh, Joseph H.	Prepare examination outline for Ms. Wurmlinger.	0.50	250.00
08/10/23	Barnes, Cory N.	Review court order on Karma's motion to	0.30	135.00

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Date	Name	Description	Hours	Amount
		strike Mr. Pampinella expert damages report.		
08/10/23	Brennan, Terry M.	Review trial exhibits related to trial witness outlines.	1.80	1,296.00
08/10/23	Brennan, Terry M.	Review transcript of Mr. Burns.	0.50	360.00
08/10/23	Brennan, Terry M.	Review tentative order on motion to strike.	0.20	144.00
08/10/23	Holbrook, Scott C.	Strategize regarding response to Karma's trade secret list.	2.10	1,449.00
08/10/23	Holbrook, Scott C.	Review Karma's proposed trade secret list.	0.80	552.00
08/10/23	Holbrook, Scott C.	Research Judge Selna's rulings on identification of trade secrets.	0.90	621.00
08/10/23	Holbrook, Scott C.	Revise Lordstown's 10-Q response.	0.20	138.00
08/10/23	Holbrook, Scott C.	Prepare Durre trial examination.	1.30	897.00
08/10/23	Holbrook, Scott C.	Strategize regarding testimonial topics for individual trial witnesses.	0.80	552.00
08/10/23	Holbrook, Scott C.	Review Karma's revisions to proposed settlement agreement.	1.00	690.00
08/10/23	Holbrook, Scott C.	Review Karma's revisions to 9019 motion.	0.30	207.00
08/10/23	Holbrook, Scott C.	Strategize regarding response to Karma's settlement revisions.	0.70	483.00
08/10/23	Holbrook, Scott C.	Draft correspondence to opposing counsel regarding trial witnesses.	0.30	207.00
08/10/23	Holbrook, Scott C.	Strategize regarding opening statement.	0.20	138.00
08/10/23	Kavouras, Daniel M.	Analyze trade secret disclosures submitted by Karma, including certain identified documents.	3.30	1,864.50
08/10/23	Kavouras, Daniel M.	Review initial proposed objections to jury instructions in preparation for meet and confer.	1.20	678.00
08/10/23	Kavouras, Daniel M.	Review Karma's proposed statement of the	1.00	565.00

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Date	Name	Description	Hours	Amount
		case to provide edits for submission to the court.		
08/10/23	Kavouras, Daniel M.	Continue reviewing potential sources of cross-examination for Karma experts, including public treatises.	1.70	960.50
08/10/23	Kavouras, Daniel M.	Prepare direct testimony of Weian Huang for trial.	1.80	1,017.00
08/10/23	Lucchesi, Thomas R.	Work on McGavock cross-examination outline.	0.60	552.00
08/10/23	Lucchesi, Thomas R.	Review and consider Karma statement of case to be submitted to Court.	0.30	276.00
08/10/23	Lucchesi, Thomas R.	Review and consider response to Karma disclosure and designation of trade secrets.	1.50	1,380.00
08/10/23	Lucchesi, Thomas R.	Review White & Case and Seyfarth edits to drafts of settlement agreement, Rule 9019 motion and District Court Notice.	1.90	1,748.00
08/10/23	Lucchesi, Thomas R.	Develop plan for trial exhibits and witness exhibit binders as required by court's pre-trial order.	1.60	1,472.00
08/10/23	Lucchesi, Thomas R.	Strategize regarding demonstrative exhibits.	1.00	920.00
08/10/23	Lucchesi, Thomas R.	Work on opening statement.	3.50	3,220.00
08/10/23	Martucci, Natalie E.	Set up files for sorting Plaintiffs Amended Exhibit List.	0.50	125.00
08/10/23	Nash, Elliot J.	Create a repository of all documents identified as trade secrets in Karma disclosure.	4.10	1,558.00
08/10/23	Nash, Elliot J.	Coordinate with service providers regarding service of trial subpoenas.	0.20	76.00
08/10/23	Nash, Elliot J.	Develop plan for creating, organizing, and submitting exhibit and witness binders for use at trial.	2.20	836.00
08/10/23	Ponikvar, Anthony B.	Communicate with Mr. Porter regarding	0.20	100.00

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Date	Name	Description	Hours	Amount
		participation at upcoming trial.		
08/10/23	Ponikvar, Anthony B.	Prepare electronic and hard-copy exhibits to be used in all phases of pending trial.	2.00	1,000.00
08/10/23	Ponikvar, Anthony B.	Analyze Karma's identified trade secrets and one-page statement of the case.	1.00	500.00
08/10/23	Ponikvar, Anthony B.	Revise proposed settlement documents.	1.50	750.00
08/10/23	Ponikvar, Anthony B.	Analyze substantive documents Karma has identified as being misappropriated trade secrets to determine how to address at trial.	2.00	1,000.00
08/10/23	Ponikvar, Anthony B.	Develop strategy for approaching Court regarding Karma's alleged definition of trade secrets at issue in litigation.	0.50	250.00
08/10/23	Walsh, Joseph H.	Prepare objections to Karma's pretrial jury instructions.	1.00	500.00
08/10/23	Walsh, Joseph H.	Analyze Karma's proposed list of trade secrets.	1.00	500.00
08/10/23	Walsh, Joseph H.	Analyze Ninth Circuit law on defining trade secrets with the requisite specificity.	1.00	500.00
08/11/23	Barnes, Cory N.	Review Karma filings of designated deposition testimony.	0.50	225.00
08/11/23	Brennan, Terry M.	Review transcript of Mr. Burns and outline direct and cross.	1.70	1,224.00
08/11/23	Brennan, Terry M.	Review other deposition transcripts that refer to Mr. Burns.	1.40	1,008.00
08/11/23	Brennan, Terry M.	Review trial exhibits that relate to Mr. Burns.	0.80	576.00
08/11/23	Brennan, Terry M.	Review Finch comparisons to prepare for client trial testimony.	0.70	504.00
08/11/23	Holbrook, Scott C.	Telephone calls with White & Case regarding settlement strategy.	0.40	276.00
08/11/23	Holbrook, Scott C.	Correspondence with White & Case regarding settlement issues.	0.80	552.00

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Date	Name	Description	Hours	Amount
08/11/23	Holbrook, Scott C.	Review White & Case's proposed edits to draft settlement agreement.	0.80	552.00
08/11/23	Holbrook, Scott C.	Review proposed order dismissing California action.	0.30	207.00
08/11/23	Holbrook, Scott C.	Review White & Case's proposed motion to seal settlement amount.	0.50	345.00
08/11/23	Holbrook, Scott C.	Review White & Case's motion to shorten notice for settlement approval hearing.	0.40	276.00
08/11/23	Holbrook, Scott C.	Review court's tentative ruling on motion to strike portions of Pampinella report.	0.30	207.00
08/11/23	Holbrook, Scott C.	Strategize regarding damages issues in connection with tentative ruling on motion to strike Pampinella.	0.90	621.00
08/11/23	Holbrook, Scott C.	Correspondence with Ms. Leonard regarding tentative order.	0.30	207.00
08/11/23	Holbrook, Scott C.	Meet and confer with opposing counsel regarding trial issues.	0.50	345.00
08/11/23	Holbrook, Scott C.	Prepare answers to Trustee's follow-up questions regarding retention application.	0.30	207.00
08/11/23	Holbrook, Scott C.	Prepare Andrews trial outline.	1.10	759.00
08/11/23	Holbrook, Scott C.	Prepare Elley trial outline.	0.60	414.00
08/11/23	Holbrook, Scott C.	Strategize regarding trial subpoena response to opposing counsel.	0.30	207.00
08/11/23	Holbrook, Scott C.	Correspondence with court regarding scheduling of hearing.	0.20	138.00
08/11/23	Holbrook, Scott C.	Review Karma's latest revisions to settlement agreement.	0.60	414.00
08/11/23	Holbrook, Scott C.	Strategize regarding response to Karma's revisions to settlement agreement.	0.80	552.00
08/11/23	Holbrook, Scott C.	Investigate options for document destruction pursuant to proposed	0.60	414.00

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Date	Name	Description	Hours	Amount
		settlement.		
08/11/23	Holbrook, Scott C.	Review revisions to draft settlement agreement.	0.40	276.00
08/11/23	Holbrook, Scott C.	Correspondence with opposing counsel regarding trial witnesses.	0.20	138.00
08/11/23	Holbrook, Scott C.	Telephone calls with Ms. Leonard regarding case issues.	0.60	414.00
08/11/23	Kavouras, Daniel M.	Attend meet and confer call with opposing counsel to discuss jury instructions and other pretrial issues.	0.60	339.00
08/11/23	Kavouras, Daniel M.	Prepare for meet and confer call with opposing counsel to discuss jury instructions and other pretrial issues.	1.00	565.00
08/11/23	Kavouras, Daniel M.	Develop strategy for raising objections to trade secret disclosures.	1.50	847.50
08/11/23	Kavouras, Daniel M.	Correspondence with client regarding upcoming depositions.	0.20	113.00
08/11/23	Kavouras, Daniel M.	Prepare for oral argument on tentative ruling striking, in part, report of Jim Pampinella.	1.70	960.50
08/11/23	Kavouras, Daniel M.	Correspondence with opposing counsel regarding evidentiary stipulation and metadata proposal.	1.00	565.00
08/11/23	Kavouras, Daniel M.	Research on specificity of trade secret disclosures to prepare for briefing regarding Karma disclosures.	1.70	960.50
08/11/23	Lucchesi, Thomas R.	Prepare for meet and confer with Seyfarth regarding jury instructions, trade secret disclosures and pretrial deadlines.	1.00	920.00
08/11/23	Lucchesi, Thomas R.	Develop strategy for raising concerns to Judge Selna concerning Karma's trade secrets disclosures.	1.00	920.00
08/11/23	Lucchesi, Thomas R.	Review and consider implications of tentative ruling on Karma motion to strike	1.50	1,380.00

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Date	Name	Description	Hours	Amount
		portions of Pampinella rebuttal report.		
08/11/23	Lucchesi, Thomas R.	Participate in meet and confer with Seyfarth attorneys to discuss jury instructions, trade secret disclosures and pretrial deadlines.	0.70	644.00
08/11/23	Lucchesi, Thomas R.	Review and comment on drafts of settlement agreement and related documents to White & Case.	1.50	1,380.00
08/11/23	Lucchesi, Thomas R.	Review Karma's trade secret disclosures to prepare for and develop arguments to be raised at August 14 status conference with Judge Selna.	1.40	1,288.00
08/11/23	McDonald, Michael H.	Plan and prepare for plaintiff and defendant exhibit hard copy conversion with Profile Discovery.	0.50	155.00
08/11/23	Nash, Elliot J.	Analyze SEC filings listed on Karma's amended trial exhibit list.	1.50	570.00
08/11/23	Ponikvar, Anthony B.	Participate in deposition preparation session with forensics expert, Mr. Finch.	0.80	400.00
08/11/23	Ponikvar, Anthony B.	Draft correspondence to opposing counsel regarding witness availability.	0.30	150.00
08/11/23	Ponikvar, Anthony B.	Prepare Karma's identified exhibits for potential use at upcoming trial.	1.50	750.00
08/11/23	Ponikvar, Anthony B.	Research Federal law regarding use of prior consistent statements as non-hearsay in anticipation of upcoming trial.	1.20	600.00
08/11/23	Ponikvar, Anthony B.	Develop strategy regarding deletion or return of alleged Karma information pursuant to potential settlement.	0.80	400.00
08/11/23	Ponikvar, Anthony B.	Analyze access reports prepared by Mr. Finch to potentially incorporate into trial outline.	0.80	400.00
08/11/23	Ponikvar, Anthony B.	Develop strategy for addressing potentially accessed documents identified by Mr. Finch at trial.	0.50	250.00

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Date	Name	Description	Hours	Amount
08/11/23	Ponikvar, Anthony B.	Compare Karma's identified trade secrets to previous discovery requests to prepare for upcoming conference with the Court.	2.50	1,250.00
08/11/23	Ponikvar, Anthony B.	Develop strategy regarding potential motions to quash facially invalid subpoenas served on current and former LMC employees.	0.50	250.00
08/11/23	Ponikvar, Anthony B.	Revise proposed settlement paperwork.	1.00	500.00
08/11/23	Walsh, Joseph H.	Prepare objections to Karma's pretrial jury instructions.	1.00	500.00
08/11/23	Walsh, Joseph H.	Analyze Karma's proposed list of trade secrets.	1.50	750.00
08/11/23	Walsh, Joseph H.	Analyze court's tentative order regarding Pampinella report.	0.50	250.00
08/11/23	Walsh, Joseph H.	Attend meet and confer with Karma's counsel regarding jury instructions.	0.50	250.00
08/12/23	Holbrook, Scott C.	Telephone calls with White & Case regarding settlement revisions.	0.50	345.00
08/12/23	Holbrook, Scott C.	Review latest revisions to draft settlement agreement.	0.40	276.00
08/12/23	Holbrook, Scott C.	Review latest revisions to 9019 motion.	0.20	138.00
08/12/23	Holbrook, Scott C.	Strategize regarding settlement response.	0.20	138.00
08/12/23	Holbrook, Scott C.	Strategize regarding response to opposing counsel regarding requests for evidentiary stipulation.	0.10	69.00
08/12/23	Holbrook, Scott C.	Strategize regarding response to Karma's list of alleged trade secrets.	0.20	138.00
08/12/23	Kavouras, Daniel M.	Review arguments in support of excluding Karma damages expert Daniel McGavock in response to comments from Court during conference on motion to strike.	1.10	621.50
08/12/23	Kavouras, Daniel M.	Review Karma edits to stipulation on admissibility of evidence and metadata.	0.70	395.50

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Date	Name	Description	Hours	Amount
08/12/23	Lucchesi, Thomas R.	Review drafts of settlement agreement and related papers.	1.50	1,380.00
08/12/23	Lucchesi, Thomas R.	Review Gudmundsson cross-examination outline.	1.00	920.00
08/12/23	Lucchesi, Thomas R.	Review caselaw and prior Selna decisions to prepare for August 14 appearance before Judge Selna to argue inadequacy of Karma's trade secret disclosures.	1.00	920.00
08/12/23	McDonald, Michael H.	Prepare metadata slip sheets for trial exhibits.	0.30	93.00
08/12/23	Ponikvar, Anthony B.	Revise one-page statement of the case proposed by opposing counsel.	1.00	500.00
08/12/23	Ponikvar, Anthony B.	Develop strategy regarding potential return or deletion of Karma information.	0.50	250.00
08/12/23	Walsh, Joseph H.	Analyze Wurmlinger report and deposition testimony in advance of preparation session.	0.60	300.00
08/13/23	Holbrook, Scott C.	Strategize regarding revisions to joint statement of case.	0.30	207.00
08/13/23	Holbrook, Scott C.	Strategize regarding settlement revisions.	0.70	483.00
08/13/23	Holbrook, Scott C.	Strategize regarding response to Karma's list of alleged trade secrets.	0.30	207.00
08/13/23	Holbrook, Scott C.	Prepare for court hearing on trade secrets.	3.70	2,553.00
08/13/23	Holbrook, Scott C.	Prepare for Pampinella deposition.	0.80	552.00
08/13/23	Holbrook, Scott C.	Telephone calls with Mr. Zakia regarding settlement.	0.40	276.00
08/13/23	Holbrook, Scott C.	Prepare Pampinella trial outline.	0.90	621.00
08/13/23	Kavouras, Daniel M.	Summarize potential offsets to avoided-cost damages in preparation for potential testimony of Adam Kroll.	1.60	904.00
08/13/23	Kavouras, Daniel M.	Draft outline of major case issues for trial.	2.20	1,243.00

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Date	Name	Description	Hours	Amount
08/13/23	Ponikvar, Anthony B.	Develop strategy regarding implementation of terms in proposed settlement agreement related to deletion of information.	1.00	500.00
08/13/23	Walsh, Joseph H.	Analyze Wurmlinger report and deposition testimony in advance of preparation session.	2.50	1,250.00
08/14/23	Brennan, Terry M.	Review documents related to Mr. Kim to prepare for trial testimony.	0.60	432.00
08/14/23	Brennan, Terry M.	Review additional transcripts for references to Mr. Kim.	1.00	720.00
08/14/23	Brennan, Terry M.	Review complaint and discovery materials in preparation for drafting witness outlines.	0.70	504.00
08/14/23	Brennan, Terry M.	Review transcript of Mr. Kim in order to outline examinations.	2.20	1,584.00
08/14/23	Brennan, Terry M.	Prepare Mr. Kim for trial.	1.50	1,080.00
08/14/23	Holbrook, Scott C.	Prepare for court hearing regarding identification of trade secrets and other pretrial issues.	2.10	1,449.00
08/14/23	Holbrook, Scott C.	Participate in court hearing with Judge Selna.	0.60	414.00
08/14/23	Holbrook, Scott C.	Correspondence with Ms. Leonard regarding court hearing.	0.10	69.00
08/14/23	Holbrook, Scott C.	Strategize regarding trade secret identification following court hearing.	0.50	345.00
08/14/23	Holbrook, Scott C.	Correspondence with White & Case regarding settlement issues and information requests.	0.30	207.00
08/14/23	Holbrook, Scott C.	Review Pampinella expert report in detail to prepare for his upcoming deposition.	1.80	1,242.00
08/14/23	Holbrook, Scott C.	Telephone calls with White & Case regarding settlement.	0.20	138.00
08/14/23	Holbrook, Scott C.	Prepare Durre trial outline.	0.30	207.00

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Date	Name	Description	Hours	Amount
08/14/23	Holbrook, Scott C.	Review revisions to settlement documents.	0.40	276.00
08/14/23	Holbrook, Scott C.	Telephone calls with White & Case regarding latest settlement revisions.	0.20	138.00
08/14/23	Holbrook, Scott C.	Draft notice to individual defendants of tentative settlement.	0.30	207.00
08/14/23	Holbrook, Scott C.	Strategize regarding potential settlement with Karma.	0.40	276.00
08/14/23	Holbrook, Scott C.	Prepare Andrews trial outline.	1.10	759.00
08/14/23	Kavouras, Daniel M.	Review Nranian expert report in preparation for objections and cross examination at trial.	2.80	1,582.00
08/14/23	Kavouras, Daniel M.	Analyze nonsolicitation and noncompete caselaw in preparation for drafting pocket brief.	1.00	565.00
08/14/23	Kavouras, Daniel M.	Attend hearing on motion to strike Pampinella report.	0.50	282.50
08/14/23	Kavouras, Daniel M.	Prepare for hearing on motion to strike Pampinella report.	1.20	678.00
08/14/23	Kavouras, Daniel M.	Begin drafting summary of various objections to Karma's expert witnesses for use at trial.	3.10	1,751.50
08/14/23	Kavouras, Daniel M.	Draft response to Karma metadata proposal.	0.30	169.50
08/14/23	Kavouras, Daniel M.	Provide comments to White & Case regarding proposed settlement drafts.	0.60	339.00
08/14/23	Kavouras, Daniel M.	Draft client update on hearing outcome and next steps.	0.30	169.50
08/14/23	Lucchesi, Thomas R.	Review and comment on drafts of Proposed Order to be entered in case to announce fact of settlement approval by Bankruptcy Court.	0.60	552.00
08/14/23	Lucchesi, Thomas R.	Attend to strategy for trial preparation and	1.70	1,564.00

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Date	Name	Description	Hours	Amount
		action items.		
08/14/23	Lucchesi, Thomas R.	Work on damages issues for trial examinations.	1.50	1,380.00
08/14/23	Lucchesi, Thomas R.	Participate in Hearing before Judge Selna on Pampinella decision and pretrial issues, including stipulations, discovery, and trade secrets designations.	0.80	736.00
08/14/23	Lucchesi, Thomas R.	Analyze at Court's direction which disclosed trade secrets to select for further review by Court following hearing.	1.20	1,104.00
08/14/23	Lucchesi, Thomas R.	Strategize regarding draft settlement agreement.	2.00	1,840.00
08/14/23	Lucchesi, Thomas R.	Prepare for Hearing before Judge Selna, including review of issues relating to Karma's inadequate trade secrets designations.	1.50	1,380.00
08/14/23	Martucci, Natalie E.	Prepare exhibits from Plaintiff's Amended Exhibit List for trial.	2.50	625.00
08/14/23	Nash, Elliot J.	Analyze caselaw regarding prior consistent statement exception to rule against hearsay.	0.50	190.00
08/14/23	Nash, Elliot J.	Draft responses to Karma's proposed jury instructions.	1.20	456.00
08/14/23	Ponikvar, Anthony B.	Participate in trial preparation session with Mr. Kim.	1.30	650.00
08/14/23	Ponikvar, Anthony B.	Compare Karma's descriptions of trade secrets to underlying documents to identify examples to present to Court.	2.00	1,000.00
08/14/23	Ponikvar, Anthony B.	Develop strategy for meeting court-ordered deadlines in light of recent developments at status conference.	0.30	150.00
08/14/23	Ponikvar, Anthony B.	Prepare court-ordered witness-specific binders to be used during examinations at trial.	3.00	1,500.00

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Date	Name	Description	Hours	Amount
08/14/23	Ponikvar, Anthony B.	Analyze correspondence from opposing counsel and proposed response thereto regarding stipulation of presentation of evidence.	0.30	150.00
08/14/23	Ponikvar, Anthony B.	Develop strategy regarding potential settlement.	1.50	750.00
08/14/23	Ponikvar, Anthony B.	Revise neutral one-page summary to propose to be read to jury during opening instructions.	1.00	500.00
08/14/23	Ponikvar, Anthony B.	Draft certification of return or destruction to be executed by individual defendants.	0.50	250.00
08/14/23	Ponikvar, Anthony B.	Revise potential demonstrative exhibits to be used at upcoming trial.	1.50	750.00
08/14/23	Walsh, Joseph H.	Analyze Karma's trade secret list, specifically, documents related to BOM and KPDS.	1.00	500.00
08/14/23	Walsh, Joseph H.	Analyze Wurmlinger report and deposition testimony in advance of preparation session.	3.00	1,500.00
08/14/23	Walsh, Joseph H.	Analyze Ninth Circuit law regarding severing trade secret claims for trial.	2.00	1,000.00
08/15/23	Brennan, Terry M.	Review potential settlement.	0.10	72.00
08/15/23	Brennan, Terry M.	Review Huang deposition transcript and documents to prepare for drafting trial examination outline.	2.80	2,016.00
08/15/23	Brennan, Terry M.	Meet with Mr. Huang to prepare for trial.	1.50	1,080.00
08/15/23	Holbrook, Scott C.	Review McGavock report to prepare for court-ordered Pampinella deposition.	0.50	345.00
08/15/23	Holbrook, Scott C.	Revise draft certification to be executed by individual defendants pursuant to Karma settlement.	0.20	138.00
08/15/23	Holbrook, Scott C.	Strategize regarding carrying out of settlement agreement requirements.	0.30	207.00

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Date	Name	Description	Hours	Amount
08/15/23	Holbrook, Scott C.	Strategize regarding preparation for court-ordered Kroll deposition.	0.50	345.00
08/15/23	Holbrook, Scott C.	Telephone call with White & Case regarding latest hearing with bankruptcy court.	0.10	69.00
08/15/23	Kavouras, Daniel M.	Draft outline of topics and questions for Adam Kroll deposition preparation meeting.	2.70	1,525.50
08/15/23	Kavouras, Daniel M.	Analyze (at Court's direction) Karma trade secret definitions to select examples for submission to court.	2.40	1,356.00
08/15/23	Kavouras, Daniel M.	Prepare new exhibits for cross-examination of Karma source code expert Mr. Zeidman at trial.	1.00	565.00
08/15/23	Kavouras, Daniel M.	Prepare outline for meeting with source code expert to prepare for his trial testimony.	2.00	1,130.00
08/15/23	Lucchesi, Thomas R.	Review drafts of "certification" to evidence obligation to return or destroy Karma documents.	0.50	460.00
08/15/23	Lucchesi, Thomas R.	Strategize regarding carrying out of settlement's requirements.	0.30	276.00
08/15/23	Martucci, Natalie E.	Prepare exhibits in connection with court-ordered exhibit list submission.	3.00	750.00
08/15/23	McDonald, Michael H.	Plan and prepare for plaintiff and defendant exhibit hard copy conversion with Profile Discovery.	1.20	372.00
08/15/23	McDonald, Michael H.	Plan and prepare plaintiff and defendant exhibit creation, in connection with court-ordered exhibit list submission.	2.10	651.00
08/15/23	Ponikvar, Anthony B.	Communicate with expert witnesses regarding conditional settlement and trial preparation efforts.	0.40	200.00
08/15/23	Ponikvar, Anthony B.	Analyze Karma's identified trade secrets and definitions in connection with court-ordered review of trade secret definitions.	1.50	750.00

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08/15/23	Ponikvar, Anthony B.	Attend hearing with bankruptcy court to monitor discussions of potential settlement.	0.50	250.00
08/15/23	Ponikvar, Anthony B.	Prepare court-mandated witness-specific binders to be used at trial.	1.50	750.00
08/15/23	Ponikvar, Anthony B.	Finalize contents of court-ordered supplemental exhibit list.	1.00	500.00
08/15/23	Ponikvar, Anthony B.	Revise certification of return and/or destruction in connection with settlement.	0.40	200.00
08/15/23	Ponikvar, Anthony B.	Finalize strategy for creation of court-ordered trial preparation binders.	0.70	350.00
08/15/23	Ponikvar, Anthony B.	Prepare newly identified exhibits for inclusion as potential trial exhibits.	1.00	500.00
08/15/23	Walsh, Joseph H.	Prepare expert Julie Wurmlinger's trial examination outline.	0.40	200.00
08/15/23	Walsh, Joseph H.	Prepare for and meet with Ms. Wurmlinger regarding trial examination.	3.80	1,900.00
08/16/23	Brennan, Terry M.	Review LaFleur deposition transcripts and documents to prepare for drafting trial examination outline.	4.10	2,952.00
08/16/23	Holbrook, Scott C.	Strategize regarding trial subpoenas.	0.20	138.00
08/16/23	Holbrook, Scott C.	Strategize regarding selection of trade secrets to challenge in submission to court.	2.00	1,380.00
08/16/23	Holbrook, Scott C.	Review Karma's trade secret list and associated documents in detail, in connection with court-ordered review.	1.20	828.00
08/16/23	Holbrook, Scott C.	Prepare for upcoming hearing on trade secret identification.	0.80	552.00
08/16/23	Holbrook, Scott C.	Continue reviewing McGavock report to prepare for meeting with Mr. Pampinella regarding his deposition.	1.00	690.00
08/16/23	Holbrook, Scott C.	Prepare mock questions for Pampinella deposition preparation.	0.50	345.00

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Date	Name	Description	Hours	Amount
08/16/23	Holbrook, Scott C.	Correspondence with court regarding scheduling of trade secret hearing.	0.20	138.00
08/16/23	Holbrook, Scott C.	Strategize regarding preparation for Kroll deposition.	0.20	138.00
08/16/23	Holbrook, Scott C.	Correspondence with opposing counsel regarding Pampinella deposition.	0.10	69.00
08/16/23	Holbrook, Scott C.	Meet and confer with opposing counsel regarding pretrial issues.	0.40	276.00
08/16/23	Holbrook, Scott C.	Correspondence with opposing counsel regarding pretrial issues.	0.30	207.00
08/16/23	Holbrook, Scott C.	Strategize regarding case issues and action items.	1.50	1,035.00
08/16/23	Holbrook, Scott C.	Prepare Durre trial outlines.	0.30	207.00
08/16/23	Holbrook, Scott C.	Prepare Elley trial outlines.	0.40	276.00
08/16/23	Holbrook, Scott C.	Prepare Andrews trial outlines.	0.80	552.00
08/16/23	Kavouras, Daniel M.	Attend deposition preparation meeting with Adam Kroll.	1.60	904.00
08/16/23	Kavouras, Daniel M.	Prepare for deposition preparation meeting with Adam Kroll.	1.50	847.50
08/16/23	Kavouras, Daniel M.	Select trade-secret definitions to submit to court for conference on adequacy of definitions.	1.70	960.50
08/16/23	Kavouras, Daniel M.	Review prior transcripts of testimony given by Mr. Kroll in preparation for his deposition in Karma action.	3.00	1,695.00
08/16/23	Kavouras, Daniel M.	Draft revised summary of Kroll testimony for production to opposing counsel.	0.50	282.50
08/16/23	Kavouras, Daniel M.	Draft proposed response to Karma regarding stipulated appendices.	0.40	226.00
08/16/23	Lucchesi, Thomas R.	Develop strategy for mandatory court submissions following meet and confer.	0.60	552.00

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08/16/23	Lucchesi, Thomas R.	Correspond with Mr. Hoeppner regarding case update.	0.30	276.00
08/16/23	Lucchesi, Thomas R.	Telephone conference with Mr. Post regarding case issues.	0.50	460.00
08/16/23	Lucchesi, Thomas R.	Develop strategy for response to creditors' committee objections to firm's retention for Karma litigation.	0.60	552.00
08/16/23	Lucchesi, Thomas R.	Finalize email to clients regarding "certification" of document destruction as a requirement of the settlement agreement.	0.40	368.00
08/16/23	Lucchesi, Thomas R.	Telephone conference with Mr. Stelmaszek regarding case status and next steps.	0.30	276.00
08/16/23	Lucchesi, Thomas R.	Develop strategy to identify six trade secret descriptions to submit to Judge Selna pursuant to his request for hearing to consider adequacy of Karma's trade secret disclosures.	3.30	3,036.00
08/16/23	Lucchesi, Thomas R.	Follow up regarding written notice to Seyfarth that scope of Mr. Kroll's testimony will include company's bankruptcy and financial condition.	0.20	184.00
08/16/23	Lucchesi, Thomas R.	Prepare for meet and confer with Seyfarth lawyers over Karma description of trade secrets.	0.50	460.00
08/16/23	Lucchesi, Thomas R.	Participate in meet and confer with Seyfarth lawyers over Karma description of trade secrets.	0.40	368.00
08/16/23	McDonald, Michael H.	Prepare supplemental defendant exhibits in Relativity database, in connection with court-ordered exhibit list.	2.60	806.00
08/16/23	McDonald, Michael H.	Prepare trial exhibits for stipulation review in Relativity database on an expedited basis.	1.70	527.00
08/16/23	McDonald, Michael H.	Prepare plaintiff exhibits in Relativity database.	1.20	372.00

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Date	Name	Description	Hours	Amount
08/16/23	Ponikvar, Anthony B.	Participate in deposition preparation session with damages expert, Mr. Pampinella.	1.50	750.00
08/16/23	Ponikvar, Anthony B.	Participate in meet and confer with opposing counsel regarding submission to court regarding trade secret definitions.	0.50	250.00
08/16/23	Ponikvar, Anthony B.	Finalize certification of destruction or return to be signed by defendants under settlement agreement.	0.30	150.00
08/16/23	Ponikvar, Anthony B.	Prepare exhibits for submission to court regarding allegedly deficient trade secret definitions.	2.00	1,000.00
08/16/23	Ponikvar, Anthony B.	Develop strategy regarding compliance with Court's request to identify representative examples of trade secrets with allegedly deficient definitions.	2.50	1,250.00
08/16/23	Ponikvar, Anthony B.	Revise arguments regarding why Karma's trade secret definitions are deficient.	0.50	250.00
08/16/23	Ponikvar, Anthony B.	Analyze communication from opposing counsel regarding proposed stipulation regarding metadata.	0.20	100.00
08/17/23	Barnes, Cory N.	Attend to case issues and action items.	1.00	450.00
08/17/23	Barnes, Cory N.	Proposed redactions of court order on Mr. Pampinella report.	0.50	225.00
08/17/23	Barnes, Cory N.	Redaction of trial exhibits to remove irrelevant information.	0.50	225.00
08/17/23	Brennan, Terry M.	Review status of trial subpoenas.	0.10	72.00
08/17/23	Brennan, Terry M.	Review trial deadlines.	0.20	144.00
08/17/23	Brennan, Terry M.	Strategize regarding arguments and themes for opening statement.	1.40	1,008.00
08/17/23	Brennan, Terry M.	Review supplemental exhibit list.	0.80	576.00
08/17/23	Holbrook, Scott C.	Prepare outline for discussion with Mr.	1.20	828.00

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Date	Name	Description	Hours	Amount
		Pampinella regarding deposition preparation.		
08/17/23	Holbrook, Scott C.	Strategize regarding responses to Karma's trade secret list.	1.00	690.00
08/17/23	Holbrook, Scott C.	Revise objections to trade secret list.	0.40	276.00
08/17/23	Holbrook, Scott C.	Telephone call with White & Case regarding creditors' committee.	0.10	69.00
08/17/23	Holbrook, Scott C.	Review of court's final order on motion to strike portions of Pampinella report.	0.20	138.00
08/17/23	Holbrook, Scott C.	Telephone call with clients regarding signing of certification of document destruction pursuant to settlement.	0.60	414.00
08/17/23	Holbrook, Scott C.	Meet with Mr. Pampinella to prepare for his deposition.	1.80	1,242.00
08/17/23	Holbrook, Scott C.	Telephone call with Mr. Pampinella regarding follow-up issues with respect to his deposition.	0.20	138.00
08/17/23	Holbrook, Scott C.	Review Karma's trade secret submission in connection with court-ordered review of trade secret definitions.	0.30	207.00
08/17/23	Holbrook, Scott C.	Strategize regarding responses to Karma's trade secret submission.	0.50	345.00
08/17/23	Holbrook, Scott C.	Research Judge Selna trade secret decisions in connection with court-ordered review of trade secret definitions.	0.70	483.00
08/17/23	Holbrook, Scott C.	Prepare Elley trial outlines.	0.80	552.00
08/17/23	Holbrook, Scott C.	Prepare Durre trial outlines.	0.60	414.00
08/17/23	Kavouras, Daniel M.	Draft responses to Karma-identified trade secret definitions for court-ordered submission.	2.80	1,582.00
08/17/23	Kavouras, Daniel M.	Draft objections to selected trade secret definitions for submission to Court.	3.00	1,695.00

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Date	Name	Description	Hours	Amount
08/17/23	Kavouras, Daniel M.	Analyze LMC 10K and 10Q filings for use as potential exhibits at trial in connection with court-ordered exhibit list submission.	1.00	565.00
08/17/23	Kavouras, Daniel M.	Draft proposed introduction to submission to judge explaining selections of trade secret definitions.	0.50	282.50
08/17/23	Kavouras, Daniel M.	Strategize regarding selection of trade secret examples to submit to Court for ruling on sufficiency of Karma definitions.	1.50	847.50
08/17/23	Kavouras, Daniel M.	Correspondence with Karma counsel regarding trade-secret definitions and submission of joint examples for consideration by Court.	1.00	565.00
08/17/23	Lucchesi, Thomas R.	Follow up with Mr. Burns and Mr. Qin regarding signing of certification regarding document destruction.	0.80	736.00
08/17/23	Lucchesi, Thomas R.	Participate in Zoom call with clients to discuss case status, discuss settlement agreement, and document destruction and certification instructions.	0.60	552.00
08/17/23	Lucchesi, Thomas R.	Revise drafts of comments to be sent to Judge Selna regarding Karma trade secret disclosures.	0.40	368.00
08/17/23	Lucchesi, Thomas R.	Prepare for Zoom call with clients to discuss case status, discuss settlement agreement, and document destruction and certification instructions.	0.40	368.00
08/17/23	Lucchesi, Thomas R.	Develop strategy for comments to be sent to Judge Selna regarding Karma trade secret disclosures.	1.50	1,380.00
08/17/23	Lucchesi, Thomas R.	Review Karma justification for trade secret descriptions.	0.50	460.00
08/17/23	Lucchesi, Thomas R.	Review and consider additional documents to be added to amended exhibit list.	0.70	644.00
08/17/23	Lucchesi, Thomas R.	Finalize opening statement.	1.70	1,564.00

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Date	Name	Description	Hours	Amount
08/17/23	Lucchesi, Thomas R.	Work on demonstrative exhibits.	0.20	184.00
08/17/23	Lucchesi, Thomas R.	Work on cross-examination outline for Karma's damages expert.	1.80	1,656.00
08/17/23	McDonald, Michael H.	Prepare trial exhibits for stipulation review in Relativity database on an expedited basis.	0.20	62.00
08/17/23	McDonald, Michael H.	Plan and prepare for plaintiff and defendant exhibit hard copy conversion with Profile Discovery.	0.30	93.00
08/17/23	Ponikvar, Anthony B.	Participate in deposition preparation session with damages expert, Mr. Pampinella.	1.80	900.00
08/17/23	Ponikvar, Anthony B.	Revise correspondence to opposing counsel regarding stipulation of evidence.	0.30	150.00
08/17/23	Ponikvar, Anthony B.	Meet with expert Mr. Finch regarding trial preparation.	1.50	750.00
08/17/23	Ponikvar, Anthony B.	Analyze "technical documents" identified by Karma to determine whether to stipulate their admissibility.	1.00	500.00
08/17/23	Ponikvar, Anthony B.	Strategize regarding trial subpoenas.	0.30	150.00
08/17/23	Ponikvar, Anthony B.	Revise objections to Karma's trade secret definitions and exhibits thereto.	1.00	500.00
08/17/23	Ponikvar, Anthony B.	Revise supplemental exhibit list.	1.20	600.00
08/17/23	Ponikvar, Anthony B.	Redact Court's order regarding motion to strike portions of expert report to be filed on public docket.	0.20	100.00
08/17/23	Walsh, Joseph H.	Prepare final proposed jury instructions and statements in support of instructions per court's order.	7.30	3,650.00
08/18/23	Barnes, Cory N.	Case law research for court-requested pocket brief on invalidity of Karma non-solicitation claims.	3.50	1,575.00
08/18/23	Barnes, Cory N.	Draft court-requested brief on invalidity of	0.50	225.00

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Date	Name	Description	Hours	Amount
		Karma non-solicitation claims.		
08/18/23	Brennan, Terry M.	Review revised exhibit list.	0.30	216.00
08/18/23	Brennan, Terry M.	Review order on motion to strike.	0.10	72.00
08/18/23	Brennan, Terry M.	Review updated pretrial due dates.	0.10	72.00
08/18/23	Brennan, Terry M.	Prepare trial outlines for Schmidt.	1.20	864.00
08/18/23	Brennan, Terry M.	Prepare trial outlines for LaFleur.	1.00	720.00
08/18/23	Brennan, Terry M.	Prepare trial outlines for Burns.	1.40	1,008.00
08/18/23	Brennan, Terry M.	Prepare trial outlines for Kim.	0.80	576.00
08/18/23	Brennan, Terry M.	Prepare trial outlines for Huang.	1.10	792.00
08/18/23	Holbrook, Scott C.	Review damages materials to prepare for Pampinella deposition.	0.50	345.00
08/18/23	Holbrook, Scott C.	Revise trade secret submission to court.	0.20	138.00
08/18/23	Holbrook, Scott C.	Correspondence with opposing counsel regarding pretrial issues.	0.30	207.00
08/18/23	Holbrook, Scott C.	Strategize regarding court-ordered exhibit list.	0.50	345.00
08/18/23	Holbrook, Scott C.	Defend Pampinella deposition.	6.90	4,761.00
08/18/23	Holbrook, Scott C.	Secure certifications from defendants pursuant to settlement.	0.20	138.00
08/18/23	Holbrook, Scott C.	Strategize regarding Pampinella deposition during deposition break.	0.20	138.00
08/18/23	Holbrook, Scott C.	Prepare Durre trial outlines.	0.40	276.00
08/18/23	Holbrook, Scott C.	Prepare Andrews trial outlines.	0.50	345.00
08/18/23	Kavouras, Daniel M.	Analyze trial-brief issues for drafting of court-requested brief.	1.10	621.50
08/18/23	Kavouras, Daniel M.	Email correspondence with opposing counsel regarding evidentiary stipulation.	0.70	395.50

Date	Name	Description	Hours	Amount
08/18/23	Kavouras, Daniel M.	Draft response to Karma's statement of support of its trade-secret definitions for submission to Court.	3.30	1,864.50
08/18/23	Kavouras, Daniel M.	Correspondence with Karma counsel regarding metadata slip sheet proposal.	0.80	452.00
08/18/23	Kavouras, Daniel M.	Revise objections to trade-secret definitions selected for submission to Court.	1.20	678.00
08/18/23	Kavouras, Daniel M.	Finalize combined trade-secret definition submission for filing with Court.	1.00	565.00
08/18/23	Lucchesi, Thomas R.	Revise drafts of submission to Judge Selna regarding objections to Karma's trade secret descriptions.	1.00	920.00
08/18/23	Lucchesi, Thomas R.	Follow up with Messrs. Qin and Huang regarding certification for settlement agreement.	0.60	552.00
08/18/23	Lucchesi, Thomas R.	Review additional documents for amended exhibit list due August 23, 2023.	0.60	552.00
08/18/23	Lucchesi, Thomas R.	Work on cross-examination outlines for expert McGavock.	1.80	1,656.00
08/18/23	Lucchesi, Thomas R.	Work on cross-examination outlines for expert Nranian.	1.20	1,104.00
08/18/23	McDonald, Michael H.	Prepare supplemental defendant exhibits in Relativity database, in connection with court-ordered exhibit list.	2.50	775.00
08/18/23	McDonald, Michael H.	Prepare plaintiff exhibits in Relativity database.	1.00	310.00
08/18/23	Nash, Elliot J.	Draft proposed jury instructions indicating all deviations from model instructions, per the court's trial order.	5.40	2,052.00
08/18/23	Ponikvar, Anthony B.	Defend deposition of damages expert, Mr. Pampinella.	7.00	3,500.00
08/18/23	Ponikvar, Anthony B.	Analyze Karma's chronology of key events to ensure all relevant correspondence is on trial exhibit list.	2.00	1,000.00

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08/18/23	Ponikvar, Anthony B.	Strategize regarding arguments and demonstrative exhibits for opening statement.	0.50	250.00
08/18/23	Ponikvar, Anthony B.	Finalize exhibits to send to court related to allegedly deficient trade secret definitions.	1.00	500.00
08/18/23	Ponikvar, Anthony B.	Prepare electronic and hard-copy versions of all trial exhibits, in connection with court-ordered exhibit list submission.	0.50	250.00
08/18/23	Ponikvar, Anthony B.	Revise objections to Karma's trade secret definitions.	0.50	250.00
08/18/23	Walsh, Joseph H.	Finalize parties' court-ordered joint submission regarding Karma's trade secret definitions.	1.00	500.00
08/18/23	Walsh, Joseph H.	Draft and revise Wurmlinger trial outline.	2.00	1,000.00
08/18/23	Walsh, Joseph H.	Revise court-ordered proposed jury instructions and statements in support.	2.00	1,000.00
08/19/23	McDonald, Michael H.	Prepare revised supplemental defendant exhibits in Relativity database.	3.00	930.00
08/19/23	Nash, Elliot J.	Draft proposed jury instructions indicating all deviations from model instructions, per the court's trial order.	0.40	152.00
08/19/23	Nash, Elliot J.	Analyze caselaw regarding trial exhibit issues.	2.20	836.00
08/19/23	Nash, Elliot J.	Continued analysis of caselaw regarding trial exhibit issues.	1.40	532.00
08/19/23	Walsh, Joseph H.	Revise proposed jury instructions and statements in support.	2.00	1,000.00
08/19/23	Walsh, Joseph H.	Strategize regarding case issues and action items.	0.50	250.00
08/20/23	Barnes, Cory N.	Attend to case issues and action items.	0.80	360.00
08/20/23	Barnes, Cory N.	Research for court requested pocket brief regarding invalidity of Karma non-	1.00	450.00

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Date	Name	Description	Hours	Amount
		solicitation claims.		
08/20/23	Brennan, Terry M.	Analyze issue of Seyfarth redactions of proposed order.	0.20	144.00
08/20/23	Kavouras, Daniel M.	Revise court-ordered comprehensive set of draft jury instructions for trial in light of team comments.	3.50	1,977.50
08/20/23	McDonald, Michael H.	Prepare plaintiff exhibits in Relativity database.	1.80	558.00
08/20/23	McDonald, Michael H.	Prepare revised supplemental and additional defendant exhibits in Relativity database.	1.60	496.00
08/20/23	Walsh, Joseph H.	Draft and revise Wurmlinger trial outline.	2.00	1,000.00
08/21/23	Barnes, Cory N.	Draft court-requested pocket brief regarding invalidity of Karma non-solicitation claims.	6.90	3,105.00
08/21/23	Barnes, Cory N.	Prepare trial exhibits and deposition videos in connection with court's requirements.	0.50	225.00
08/21/23	Brennan, Terry M.	Correspond with witnesses regarding case issues.	0.20	144.00
08/21/23	Brennan, Terry M.	Review testimony on source code development and alleged misuse.	4.80	3,456.00
08/21/23	Brennan, Terry M.	Review expert reports for allegations on misappropriated source code, and response.	2.70	1,944.00
08/21/23	Holbrook, Scott C.	Telephone call with Mr. Kroll to prepare for his deposition.	0.10	69.00
08/21/23	Holbrook, Scott C.	Review documents in preparation for Kroll deposition.	0.90	621.00
08/21/23	Holbrook, Scott C.	Correspondence with Mr. Pampinella regarding deposition preparation.	0.10	69.00
08/21/23	Holbrook, Scott C.	Telephone calls with White & Case regarding case issues.	0.20	138.00
08/21/23	Holbrook, Scott C.	Defend Kroll deposition.	1.50	1,035.00

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Date	Name	Description	Hours	Amount
08/21/23	Holbrook, Scott C.	Review correspondence from opposing counsel regarding pretrial issues.	0.10	69.00
08/21/23	Holbrook, Scott C.	Review technical documents in detail for purposes of proposed evidentiary stipulation and in preparation for upcoming court conference.	2.50	1,725.00
08/21/23	Holbrook, Scott C.	Strategize regarding identification of trade secrets following hearing with Judge Selna.	0.50	345.00
08/21/23	Holbrook, Scott C.	Prepare Durre trial outlines.	0.40	276.00
08/21/23	Holbrook, Scott C.	Prepare Huan trial outlines.	1.00	690.00
08/21/23	Kavouras, Daniel M.	Prepare for oral argument on Karma's proposed trade-secret definitions.	2.20	1,243.00
08/21/23	Kavouras, Daniel M.	Prepare to defend deposition of Adam Kroll.	2.00	1,130.00
08/21/23	Kavouras, Daniel M.	Defend deposition of Adam Kroll.	0.90	508.50
08/21/23	Kavouras, Daniel M.	Review technical documents identified by Karma to be part of proposed stipulation to admissibility to determine positions on objections.	4.50	2,542.50
08/21/23	Kavouras, Daniel M.	Attend oral argument on Karma proposed trade-secret definitions.	0.70	395.50
08/21/23	Lucchesi, Thomas R.	Review court-ordered draft jury instructions to be exchanged with counsel on August 23.	1.30	1,196.00
08/21/23	Lucchesi, Thomas R.	Prepare for oral hearing before Judge Selna regarding dispute over sufficiency of Karma trade secret descriptions.	1.00	920.00
08/21/23	Lucchesi, Thomas R.	Review of "technical" documents to decide whether to stipulate to admissibility as requested by Karma's counsel, in connection with court-ordered meet and confer.	2.50	2,300.00
08/21/23	Lucchesi, Thomas R.	Participate in oral hearing before Judge Selna regarding dispute over sufficiency of	0.60	552.00

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Date	Name	Description	Hours	Amount
		Karma trade secret descriptions.		
08/21/23	Lucchesi, Thomas R.	Review Darren Post notes comparing Endurance and Revero for use in opening statement and direct examination.	0.60	552.00
08/21/23	Lucchesi, Thomas R.	Review Pampinella deposition transcript.	0.80	736.00
08/21/23	Martucci, Natalie E.	Redact financial documents from amended exhibit list.	1.50	375.00
08/21/23	McDonald, Michael H.	Prepare plaintiff exhibits in Relativity database.	1.40	434.00
08/21/23	McDonald, Michael H.	Prepare revised supplemental and additional defendant exhibits in Relativity database.	0.10	31.00
08/21/23	Nash, Elliot J.	Prepare trial exhibits, including tracking sheet for exhibit binders, witness binders, local rules, relevant court orders.	1.70	646.00
08/21/23	Nash, Elliot J.	Analyze trial exhibits.	0.60	228.00
08/21/23	Nash, Elliot J.	Analyze California and federal caselaw regarding trade secret issues.	1.60	608.00
08/21/23	Ponikvar, Anthony B.	Participate in oral argument with court regarding definition of trade secrets.	0.50	250.00
08/21/23	Ponikvar, Anthony B.	Develop strategy regarding waiving objections to specific trial exhibits, as requested by opposing counsel.	2.00	1,000.00
08/21/23	Ponikvar, Anthony B.	Communicate with opposing counsel regarding availability of witnesses.	0.30	150.00
08/21/23	Ponikvar, Anthony B.	Correspond with opposing counsel regarding redactions to court order on motion to strike.	0.20	100.00
08/21/23	Ponikvar, Anthony B.	Analyze memorandum on trial exhibits.	0.40	200.00
08/21/23	Ponikvar, Anthony B.	Perform, in connection with court-ordered meet and confer, detailed review of "technical documents" to determine which, if any, will be stipulated to as admissible at	2.00	1,000.00

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Date	Name	Description	Hours	Amount
		trial.		
08/21/23	Ponikvar, Anthony B.	Analyze draft of proposed jury instructions.	0.50	250.00
08/21/23	Ponikvar, Anthony B.	Work with litigation support staff and outside vendors to prepare electronic and hard-copy versions of trial exhibits.	1.20	600.00
08/21/23	Walsh, Joseph H.	Revise proposed jury instructions and statements in support.	1.30	650.00
08/21/23	Walsh, Joseph H.	Analyze Ninth Circuit law on punitive damages regarding trade secret misappropriation.	0.50	250.00
08/21/23	Walsh, Joseph H.	Meet with Ms. Wurmlinger to prepare for trial.	2.50	1,250.00
08/21/23	Walsh, Joseph H.	Revise Wurmlinger trial outline.	2.00	1,000.00
08/22/23	Barnes, Cory N.	Case law research in support of defendants' proposed jury instructions.	2.40	1,080.00
08/22/23	Barnes, Cory N.	Prepare trial exhibits.	0.90	405.00
08/22/23	Brennan, Terry M.	Review amended exhibit list.	0.40	288.00
08/22/23	Brennan, Terry M.	Review transcripts and documents related to Mr. Lee.	3.80	2,736.00
08/22/23	Brennan, Terry M.	Meet with Mr. Lee for trial preparation.	1.00	720.00
08/22/23	Brennan, Terry M.	Prepare Lee trial examination.	2.20	1,584.00
08/22/23	Holbrook, Scott C.	Correspondence with White & Case regarding case issues.	0.10	69.00
08/22/23	Holbrook, Scott C.	Gather information to respond to White & Case information request.	0.10	69.00
08/22/23	Holbrook, Scott C.	Correspondence with opposing counsel regarding trade secrets.	0.20	138.00
08/22/23	Holbrook, Scott C.	Correspondence with client regarding trial subpoena.	0.10	69.00
08/22/23	Holbrook, Scott C.	Draft and revise jury instructions.	1.50	1,035.00

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Date	Name	Description	Hours	Amount
08/22/23	Holbrook, Scott C.	Trial preparation, including revisions to Wurmlinger trial outline.	0.80	552.00
08/22/23	Holbrook, Scott C.	Preparation of Elley trial outline.	2.90	2,001.00
08/22/23	Kavouras, Daniel M.	Review additional public sources for exhibits to add to amended exhibit list.	4.00	2,260.00
08/22/23	Kavouras, Daniel M.	Draft court-requested pretrial brief on enforceability of noncompete, nonsolicitation, and confidentiality provisions of employment agreements pursuant to court order.	4.40	2,486.00
08/22/23	Lucchesi, Thomas R.	Respond to White & Case request for information about settlement discussions during course of litigation.	0.30	276.00
08/22/23	Lucchesi, Thomas R.	Review final draft of jury instructions to be exchanged with Seyfarth.	0.70	644.00
08/22/23	Lucchesi, Thomas R.	Review amended exhibit list to be exchanged with Seyfarth.	0.50	460.00
08/22/23	Lucchesi, Thomas R.	Prepare McGavock cross-examination outlines.	2.10	1,932.00
08/22/23	Lucchesi, Thomas R.	Prepare Nranian cross-examination outlines.	2.00	1,840.00
08/22/23	Lucchesi, Thomas R.	Review Kroll deposition transcript.	0.50	460.00
08/22/23	McDonald, Michael H.	Coordinate plaintiff and defendant exhibit hard copy conversion with Profile Discovery.	0.20	62.00
08/22/23	McDonald, Michael H.	Prepare exhibit sort order in final trial exhibit database.	0.30	93.00
08/22/23	McDonald, Michael H.	Prepare court-ordered witness binders from Opus database.	0.20	62.00
08/22/23	McDonald, Michael H.	Prepare plaintiff exhibits in Relativity database.	2.10	651.00
08/22/23	McDonald, Michael H.	Prepare identified gap of defendant exhibits	1.30	403.00

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Date	Name	Description	Hours	Amount
		in Relativity database.		
08/22/23	Nash, Elliot J.	Strategize regarding case issues and action items.	1.30	494.00
08/22/23	Ponikvar, Anthony B.	Analyze proposed jury instructions.	0.50	250.00
08/22/23	Ponikvar, Anthony B.	Prepare electronic and hard-copy versions of trial exhibits.	1.30	650.00
08/22/23	Ponikvar, Anthony B.	Finalize working draft of amended trial exhibit list and identify which exhibits may be used only if needed pursuant to court order.	1.20	600.00
08/22/23	Ponikvar, Anthony B.	Develop trial demonstrative exhibits for expert trial examinations.	0.30	150.00
08/22/23	Ponikvar, Anthony B.	Analyze Kroll deposition transcript.	0.80	400.00
08/22/23	Ponikvar, Anthony B.	Revise Finch trial outline.	1.00	500.00
08/22/23	Walsh, Joseph H.	Revise proposed jury instructions and statements in support.	2.20	1,100.00
08/22/23	Walsh, Joseph H.	Strategize regarding case issues.	0.50	250.00
08/23/23	Barnes, Cory N.	Draft pocket brief regarding invalidity of provisions in Karma employment contracts.	1.70	765.00
08/23/23	Brennan, Terry M.	Review second amended exhibit lists.	0.80	576.00
08/23/23	Brennan, Terry M.	Review jury instructions and verdict form.	1.60	1,152.00
08/23/23	Brennan, Terry M.	Review documents and transcripts related to Mr. Qin.	3.10	2,232.00
08/23/23	Brennan, Terry M.	Prepare Qin trial outline.	1.70	1,224.00
08/23/23	Brennan, Terry M.	Meet with Mr. Quin regarding trial preparation.	1.00	720.00
08/23/23	Brennan, Terry M.	Review Zeidman report.	0.90	648.00
08/23/23	Holbrook, Scott C.	Draft and revise exhibit list.	0.80	552.00
08/23/23	Holbrook, Scott C.	Strategize regarding trade secret	0.20	138.00

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Date	Name	Description	Hours	Amount
		objections, in connection with court's review of same.		
08/23/23	Holbrook, Scott C.	Strategize regarding compliance with protective order.	0.60	414.00
08/23/23	Holbrook, Scott C.	Revise jury instructions.	0.40	276.00
08/23/23	Holbrook, Scott C.	Revise court-requested pocket brief on non-solicitation issues.	0.60	414.00
08/23/23	Holbrook, Scott C.	Revise Durre trial outlines.	0.40	276.00
08/23/23	Holbrook, Scott C.	Revise Huan trial outlines.	0.40	276.00
08/23/23	Holbrook, Scott C.	Revise Andrews trial outlines.	0.60	414.00
08/23/23	Holbrook, Scott C.	Revise Elley trial outlines.	3.20	2,208.00
08/23/23	Kavouras, Daniel M.	Revise verdict forms to add specific findings for each Karma-proposed trade secret.	1.50	847.50
08/23/23	Kavouras, Daniel M.	Review final jury instructions and statements in support.	3.20	1,808.00
08/23/23	Kavouras, Daniel M.	Finalize initial draft of court-requested pretrial brief on enforceability of noncompete, nonsolicitation, and confidentiality provisions in employment agreements.	3.30	1,864.50
08/23/23	Kavouras, Daniel M.	Revise draft exhibit list to include additional public documents refuting Karma trade-secret claims.	1.50	847.50
08/23/23	Lucchesi, Thomas R.	Final review of draft of jury instructions and verdict forms to be sent to counsel.	0.70	644.00
08/23/23	Lucchesi, Thomas R.	Review draft of pocket briefing regarding enforceability of non-solicitation and non-compete provisions in Karma employment agreements.	0.70	644.00
08/23/23	Lucchesi, Thomas R.	Strategize regarding action items.	1.00	920.00
08/23/23	Lucchesi, Thomas R.	Review amended exhibit list to be sent to	0.60	552.00

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Date	Name	Description	Hours	Amount
		opposing counsel.		
08/23/23	Lucchesi, Thomas R.	Develop response to Ms. Leonard regarding next steps and cost of same if settlement is approved.	0.50	460.00
08/23/23	McDonald, Michael H.	Prepare plaintiff exhibits in Relativity database.	1.70	527.00
08/23/23	McDonald, Michael H.	Prepare identified gap of defendant exhibits in Relativity database.	0.60	186.00
08/23/23	Ponikvar, Anthony B.	Attend to case issues and action items.	0.50	250.00
08/23/23	Ponikvar, Anthony B.	Communicate with trial witness Mr. Porter regarding case update.	0.20	100.00
08/23/23	Ponikvar, Anthony B.	Analyze publicly available technical information to rebut Karma's arguments regarding identified trade secrets in connection with court's review of same.	3.00	1,500.00
08/23/23	Ponikvar, Anthony B.	Prepare hard-copy versions of trial exhibits.	1.00	500.00
08/23/23	Ponikvar, Anthony B.	Analyze documents included on Karma's second amended exhibit list.	0.70	350.00
08/23/23	Ponikvar, Anthony B.	Update and revise amended exhibit list.	1.50	750.00
08/23/23	Walsh, Joseph H.	Finalize proposed verdict forms.	1.00	500.00
08/23/23	Walsh, Joseph H.	Finalize proposed jury instructions and statements in support.	2.00	1,000.00
08/24/23	Barnes, Cory N.	Prepare trial exhibits for fact witnesses.	3.50	1,575.00
08/24/23	Barnes, Cory N.	Draft objections to Karma proposed jury instructions in connection with court's requirements.	2.30	1,035.00
08/24/23	Brennan, Terry M.	Review Lira list information.	1.30	936.00
08/24/23	Brennan, Terry M.	Correspond with Mr. Qin regarding trial preparation and source code check-ins.	0.90	648.00
08/24/23	Brennan, Terry M.	Revise trial outlines for Schmidt.	1.20	864.00

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Date	Name	Description	Hours	Amount
08/24/23	Brennan, Terry M.	Revise trial outlines for Burns.	1.80	1,296.00
08/24/23	Brennan, Terry M.	Revise trial outlines for Kim.	0.70	504.00
08/24/23	Holbrook, Scott C.	Revise court-requested pocket brief regarding non-solicitation issues.	0.60	414.00
08/24/23	Holbrook, Scott C.	Review trade secret hearing transcript.	0.30	207.00
08/24/23	Holbrook, Scott C.	Correspondence with Ms. Leonard regarding case issues.	0.20	138.00
08/24/23	Holbrook, Scott C.	Strategize regarding trade secret definitions in connection with court's review of same.	0.50	345.00
08/24/23	Holbrook, Scott C.	Telephone call with White & Case regarding case issues.	0.10	69.00
08/24/23	Holbrook, Scott C.	Revise Huan trial examinations.	0.30	207.00
08/24/23	Holbrook, Scott C.	Revise Andrews trial examinations.	0.90	621.00
08/24/23	Holbrook, Scott C.	Revise Elley trial examinations.	2.50	1,725.00
08/24/23	Kavouras, Daniel M.	Meet with expert Mr. Miller regarding trial preparation.	2.00	1,130.00
08/24/23	Kavouras, Daniel M.	Work on Miller trial outline.	3.00	1,695.00
08/24/23	Lucchesi, Thomas R.	Analyze obligations under Stipulated Protective Order regarding return or destruction of documents and draft required certification for affected persons to execute.	0.60	552.00
08/24/23	Lucchesi, Thomas R.	Attention to settlement issues.	0.30	276.00
08/24/23	Lucchesi, Thomas R.	Follow up regarding witness trial subpoenas.	0.30	276.00
08/24/23	Lucchesi, Thomas R.	Review revised draft of court-requested pocket brief regarding unenforceability of non-solicitation and non-compete provisions in defendants' Karma employment agreements.	0.60	552.00
08/24/23	Lucchesi, Thomas R.	Draft notice to clients in anticipation of court's approval of settlement.	0.40	368.00

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Date	Name	Description	Hours	Amount
08/24/23	Lucchesi, Thomas R.	Review hearing transcript from August 21 Status Conference to determine Judge's instruction regarding trade secrets descriptions.	0.50	460.00
08/24/23	McDonald, Michael H.	Coordinate plaintiff exhibit hard copy conversion with Profile Discovery.	0.90	279.00
08/24/23	McDonald, Michael H.	Finalize plaintiff exhibits in Relativity database.	1.80	558.00
08/24/23	Nash, Elliot J.	Draft objections to Karma's proposed jury instructions.	0.80	304.00
08/24/23	Ponikvar, Anthony B.	Develop strategy regarding destruction of information covered by protective order.	0.50	250.00
08/24/23	Ponikvar, Anthony B.	Develop strategy for meeting all pretrial case deadlines.	1.00	500.00
08/24/23	Ponikvar, Anthony B.	Ensure quality of court-ordered witness binders.	2.50	1,250.00
08/24/23	Ponikvar, Anthony B.	Analyze creditor committee's statement in support of motion to approve settlement.	0.30	150.00
08/24/23	Ponikvar, Anthony B.	Analyze transcript from hearing with Judge Selna related to Karma's alleged trade secrets.	0.30	150.00
08/24/23	Ponikvar, Anthony B.	Analyze proposed metadata to be affixed to trial exhibits.	0.50	250.00
08/24/23	Ponikvar, Anthony B.	Draft outline for ex parte application related to Karma's definition of trade secrets.	0.50	250.00
08/24/23	Ponikvar, Anthony B.	Analyze Karma's proposed jury instructions.	0.50	250.00
08/24/23	Ponikvar, Anthony B.	Revise pocket brief regarding enforceability of contractual provisions in Karma employment agreements.	0.50	250.00
08/24/23	Walsh, Joseph H.	Begin drafting court-ordered objections to Karma's preliminary pretrial jury instructions.	1.00	500.00

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Date	Name	Description	Hours	Amount
08/24/23	Walsh, Joseph H.	Analyze Karma's proposed jury instructions.	4.00	2,000.00
08/24/23	Walsh, Joseph H.	Analyze ex parte application rules.	0.20	100.00
08/25/23	Barnes, Cory N.	Case law research for objections to Karma proposed jury instructions.	1.20	540.00
08/25/23	Barnes, Cory N.	Prepare trial exhibits to be used during witness examinations.	0.90	405.00
08/25/23	Brennan, Terry M.	Revise trial examinations for LaFleur.	0.80	576.00
08/25/23	Brennan, Terry M.	Revise trial examinations for Huang.	0.90	648.00
08/25/23	Brennan, Terry M.	Revise trial examinations for Lee.	1.40	1,008.00
08/25/23	Brennan, Terry M.	Revise trial examinations for Qin.	1.30	936.00
08/25/23	Kavouras, Daniel M.	Strategize regarding potential motion to strike trade-secret definitions.	2.00	1,130.00
08/25/23	Kavouras, Daniel M.	Analyze proposed evidentiary stipulation issues relating to metadata and technical documents.	1.80	1,017.00
08/25/23	Kavouras, Daniel M.	Revise draft metadata stipulation.	0.80	452.00
08/25/23	McDonald, Michael H.	Prepare witness preparation binders from Opus database.	1.00	310.00
08/25/23	Ponikvar, Anthony B.	Finalize strategy regarding issuance of subpoenas on Karma witnesses.	0.40	200.00
08/25/23	Ponikvar, Anthony B.	Analyze documents included on Karma's second amended exhibit list.	0.70	350.00
08/25/23	Ponikvar, Anthony B.	Revise certification of document return or destruction pursuant to protective order.	0.50	250.00
08/25/23	Ponikvar, Anthony B.	Analyze creditor committee's statement in support of settlement.	0.20	100.00
08/25/23	Ponikvar, Anthony B.	Compile hard copy trial exhibits to be used at upcoming trial.	2.50	1,250.00
08/25/23	Ponikvar, Anthony B.	Review trial examination for experts Mr. Andrews.	2.00	1,000.00

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Date	Name	Description	Hours	Amount
08/25/23	Ponikvar, Anthony B.	Review trial examination for experts Mr. Finch.	1.50	750.00
08/25/23	Ponikvar, Anthony B.	Revise demonstrative exhibits.	1.00	500.00
08/26/23	Nash, Elliot J.	Draft objections to Karma's proposed jury instructions.	4.60	1,748.00
08/27/23	Brennan, Terry M.	Attend to case issues and action items.	2.20	1,584.00
08/27/23	Ponikvar, Anthony B.	Strategize regarding case action items.	1.20	600.00
08/27/23	Walsh, Joseph H.	Draft objections to Karma's trade secret jury instructions.	3.30	1,650.00
08/28/23	Barnes, Cory N.	Draft objections to Karma proposed jury instructions.	3.30	1,485.00
08/28/23	Brennan, Terry M.	Correspond with clients regarding settlement.	0.30	216.00
08/28/23	Holbrook, Scott C.	Strategize regarding compliance with protective order in light of settlement.	0.50	345.00
08/28/23	Holbrook, Scott C.	Correspondence with opposing counsel regarding settlement issues.	0.30	207.00
08/28/23	Holbrook, Scott C.	Correspondence with client regarding settlement issues.	0.20	138.00
08/28/23	Holbrook, Scott C.	Contact trial witnesses and experts regarding settlement and document issues.	0.40	276.00
08/28/23	Holbrook, Scott C.	Prepare notice of settlement for filing with California court.	0.30	207.00
08/28/23	Kavouras, Daniel M.	Review updated bankruptcy filings to assess settlement issues.	1.10	621.50
08/28/23	Lucchesi, Thomas R.	Follow up regarding winding down and document destruction requirements following settlement approval.	2.00	1,840.00
08/28/23	Lucchesi, Thomas R.	Follow up regarding contacting experts and non-party witnesses regarding settlement.	0.60	552.00

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Date	Name	Description	Hours	Amount
08/28/23	Ponikvar, Anthony B.	Monitor bankruptcy proceedings related to potential settlement.	0.50	250.00
08/28/23	Ponikvar, Anthony B.	Draft certification of destruction or return pursuant to protective order.	0.40	200.00
08/28/23	Ponikvar, Anthony B.	Finalize order regarding stipulated dismissal.	0.40	200.00
08/28/23	Ponikvar, Anthony B.	Attend to case issues and action items.	1.50	750.00
08/28/23	Walsh, Joseph H.	Strategize regarding case issues and action items.	1.10	550.00
08/29/23	Holbrook, Scott C.	Strategize regarding destruction of documents pursuant to requirements of protective order.	0.20	138.00
08/29/23	Lucchesi, Thomas R.	Review document return/destruction obligation pursuant to terms of settlement and Stipulated Protective Order and develop for parties and firm to comply.	1.00	920.00
08/30/23	Holbrook, Scott C.	Correspondence with opposing counsel regarding case issues.	0.20	138.00
08/30/23	Holbrook, Scott C.	Develop action plan for compliance with document destruction requirements in protective order.	3.30	2,277.00
08/30/23	Lucchesi, Thomas R.	Finalize strategy for compliance with obligations under settlement agreement and Stipulated Protective Order relating to return or destruction of certain documents and information.	1.70	1,564.00
08/30/23	Lucchesi, Thomas R.	Attend to compliance with document aspects of settlement.	0.30	276.00
08/30/23	Lucchesi, Thomas R.	Communications with Mr. Stelmaszek regarding case settlement.	0.30	276.00
08/30/23	Ponikvar, Anthony B.	Develop strategy regarding compliance with protective order and settlement agreement pertaining to deletion of information.	2.50	1,250.00
08/31/23	Holbrook, Scott C.	Review court order entering stay of	0.10	69.00

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Date	Name	Description	Hours	Amount
		litigation.		
08/31/23	Holbrook, Scott C.	Strategize regarding compliance with protective order.	0.10	69.00
08/31/23	Holbrook, Scott C.	Revise certification of document destructions pursuant to protective order.	0.10	69.00
08/31/23	Lucchesi, Thomas R.	Review and assess additional obligations arising out of revised language in Judge Selna's "stay" order modifying parties' certification obligations relating to the destruction of certain documents and information.	0.50	460.00
08/31/23	McDonald, Michael H.	Plan and prepare for deletion of alleged Karma data on Lordstown systems.	0.30	93.00
08/31/23	McDonald, Michael H.	Plan and prepare for deletion of Karma data in Baker environment and archiving of Relativity databases post settlement.	0.30	93.00
08/31/23	Ponikvar, Anthony B.	Develop legal and logistical strategy regarding compliance with protective order and terms of settlement agreement.	1.50	750.00
Total			983.20	577,385.50

Expenses and Other Charges

08/04/23	Airfare/Trainfare (E110) Airfare; Terry M Brennan; Airfare for Lordstown trial 8-4-23;	1,281.25
Subtotal - Airfare/Trainfare (E110)		1,281.25
08/23/23	Corporate Services (E119) MIRIAM BAIRD;Karma v. Client transcript request; Inv. BAIRD-082323	296.10
Subtotal - Corporate Services (E119)		296.10
08/22/23	Court Costs (E112) SHARON SEFFENS;Copy of hearing transcript; Inv. SEFFE-08222023	228.00
Subtotal - Court Costs (E112)		228.00

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08/02/23	UPS Joshua W. Hoeppner PresentationView, LLC 298 Lyn gail Court Columbus OH 1Z4866551395527872	10.05
08/22/23	UPS Sharon Seffens U.S. District Courthouse 411 West 4th Street Room 1-053 Santa Ana CA 1Z4866550199 952678	9.34
08/28/23	UPS Miriam Baird Court Reporter 350 West First Stree t Fourth Floor Los Angeles CA 1Z4866550199159008	9.34
08/29/23	UPS 299895IJ49I	13.89
Subtotal - Delivery Services (E107)		42.62
08/07/23	Miscellaneous (E124) Ponikvar, Anthony B;Graphics template for use in creation of demonstrative exhibits.; Inv. 10682-Lordstown- 20230828	24.90
Subtotal - Miscellaneous (E124)		24.90
08/29/23	Outside Duplicating & Binding (E102) PROFILE DISCOVERY;Preparation of trial exhibits; Inv. 1774620	21,102.41
Subtotal - Outside Duplicating & Binding (E102)		21,102.41
08/24/23	Service of Process Fees/Subpoena Fees (E113) VERITEXT LEGAL SOLUTIONS;Subpoena Service - Christine Ingersoll Secord; Inv. 6765868	275.08
08/24/23	Service of Process Fees/Subpoena Fees (E113) VERITEXT LEGAL SOLUTIONS;Subpoena Service - Ronald Samaco; Inv. 6765865	247.04
08/24/23	Service of Process Fees/Subpoena Fees (E113) VERITEXT LEGAL SOLUTIONS;Subpoena Service - Shen Zhang; Inv. 6764203	275.08
08/24/23	Service of Process Fees/Subpoena Fees (E113) VERITEXT LEGAL SOLUTIONS;Subpoena Service on Robert Pelky; Inv. 6763732	265.82
08/25/23	Service of Process Fees/Subpoena Fees (E113) VERITEXT LEGAL SOLUTIONS;Service of Subpoena - John Cazort; Inv. 6763737	242.45
08/29/23	Service of Process Fees/Subpoena Fees (E113) VERITEXT LEGAL SOLUTIONS;Service of Subpoena on witness Weian Huang; Inv. 6767391	239.15
08/29/23	Service of Process Fees/Subpoena Fees (E113) VERITEXT LEGAL SOLUTIONS;Service of Subpoena on witness William Jeffrey DeFrank; Inv. 6767624	187.00

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08/31/23	Service of Process Fees/Subpoena Fees (E113) VERITEXT LEGAL SOLUTIONS;Subpoena Service Fee for Enrique Hernandez; Inv. 6784521	465.00
Subtotal - Service of Process Fees/Subpoena Fees (E113)		2,196.62
Total		\$ 25,171.90

B490

Labor Matters (2022-2024)

116592.000116

Name	Title	Hours	Rate	Amount
Dawson, Todd A.	Partner	1.30	\$ 665.00	\$ 864.50
10% Courtesy Discount				(86.45)
Total		1.30		\$ 778.05

Date	Name	Description	Hours	Amount
08/30/23	Dawson, Todd A.	Participate in conference with Ms. Leonard regarding WARN issues.	0.30	199.50
08/31/23	Dawson, Todd A.	Review regulations concerning information to be included in notices to state dislocated worker unit, chief elected official and individual employees; edit notices to be distributed regarding potential operational changes; research regarding public availability of notices.	1.00	665.00
Total			1.30	864.50

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B510

General Benefit Matters (2022-2024)
116592.000126

Name	Title	Hours	Rate	Amount
Murray, Brian M.	Partner	2.30	\$ 685.00	\$ 1,575.50
10% Courtesy Discount				(157.55)
Total		2.30		\$ 1,417.95

Date	Name	Description	Hours	Amount
08/09/23	Murray, Brian M.	Attention to questions from outside auditors of savings plan relating to compliance with various law requirements.	2.30	1,575.50
	Total		2.30	1,575.50